A185 0003

Bechtel
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Memorandum

To: Sandra Carroll, EPA Region IX
Subject: Completed Work
Date: June 17, 1994
cc: Catherine C. Walton, BEI ARCS

Attached is the following completed document:

PA X SI _____ Other _____

Site Name: Valley Iron and Metal (Edman Corp.)
EPA ID: CA0 000001156 (4917)
City, County, State: El Centro, Imperial County, Calif.

For EPA Use Only

Latitude: 32° 48' 06.0" N Longitude: 115° 30' 13.0" W

CERCLIS Changes: Change site name from Valley Iron and Metal (Rodman Corp.) to Valley Iron and Metal (Edman Corp.)

EPA Further Action Determination: NFA
Lead Agency: F
Sign-Off Date: 6/23/94
Initials of Work Assignment Manager: CT for SC
Document Screening Coordinator: [signature] 6-22-94
Chief, Site Evaluation and Grants Section: [signature] 6/24

Moore 6/28/94

Bechtel

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San Francisco, CA 94119-3965

Preliminary Assessment

Site: Valley Iron and Metal (Edman Corp.)
2004 Highway 111
El Centro, Calif. 92243

Site EPA ID Number: CA0 000001156

Work Assignment Number: 60-32-9JZZ, ARCSWEST Program

Submitted to: Sandra Carroll
Work Assignment Manager
EPA Region IX

Date: June 17, 1994

Prepared by: Eric S. Wilson

Review and Concurrence: Catherine C. Walton

BECHTEL *Bechtel Environmental, Inc.*

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA), Region IX, under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), has tasked Bechtel Environmental, Inc. (BEI) to conduct a preliminary assessment (PA) of the Valley Iron and Metal (Edman Corp.) site in El Centro, Imperial County, Calif.

The purpose of the PA is to review existing information on the site and its environs to assess the threat(s), if any, posed to public health, welfare, or the environment and to determine if further investigation under CERCLA/SARA is warranted. The scope of the PA includes the review of information available from federal, state, and local agencies and performance of an onsite reconnaissance visit.

Using these sources of existing information, the site is then evaluated using the EPA's Hazard Ranking System (HRS) criteria to assess the relative threat associated with actual or potential releases of hazardous substances at the site. The HRS has been adopted by the EPA to help set priorities for further evaluation and eventual remedial action at hazardous waste sites. The HRS is the primary method of determining a site's eligibility for placement on the National Priorities List (NPL). The NPL identifies sites at which the EPA may conduct remedial response actions. This report summarizes the findings of these preliminary investigative activities.

The Valley Iron and Metal site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) in September, 1993 (CA0 000001156) (1). The site was entered into CERCLIS as the result of the site-discovery program conducted by the EPA in Imperial County.

1.1 Apparent Problem

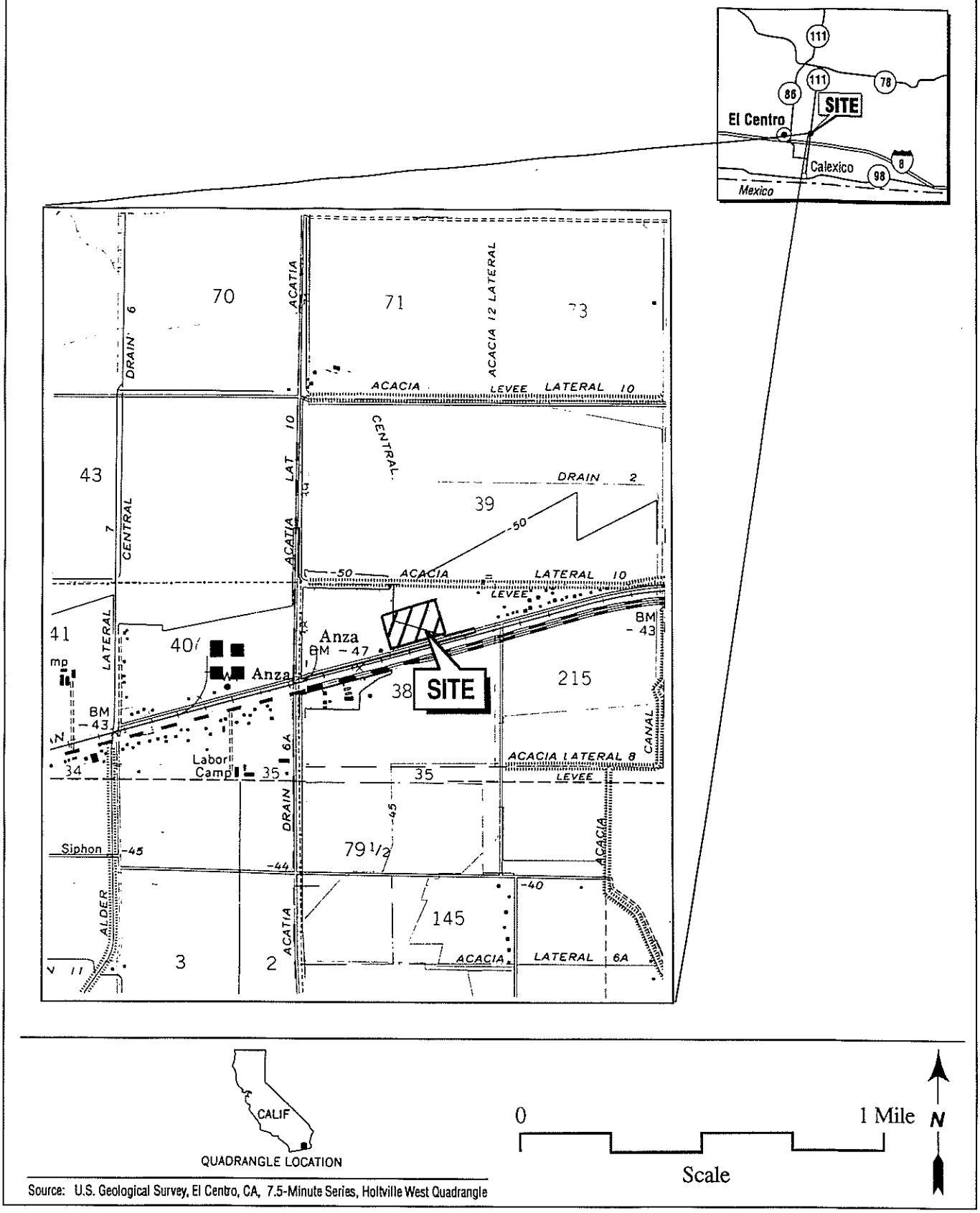
The apparent problem associated with this site is as follows:

- In June 1991, at the request of the Imperial County Division of Environmental Health Services, six soil samples were collected from a soil pile onsite by a consultant for the operators of Valley Iron and Metal. Analytical results from these onsite soil samples indicated the presence of arsenic, cadmium, lead, mercury, and polychlorinated biphenyls. (2)

2.0 SITE DESCRIPTION

2.1 Location

The Valley Iron and Metal site is located at 2004 Highway 111, El Centro, Imperial County, Calif. The geographical coordinates are 32° 48' 06.0" N latitude and 115° 30' 13.0" W longitude (San Bernardino Baseline and Meridian, El Centro, California 7.5-minute quadrangle) (3). The location of the site is shown in Figure 2-1.



Source: U.S. Geological Survey, El Centro, CA, 7.5-Minute Series, Holtville West Quadrangle

Figure 2-1 Site Location

2.2 Site Description

As shown in Figure 2-2, the site occupies approximately 53 acres and is 3 miles east of El Centro in a mixed rural, agricultural area. The site is bordered to the north by a General Motors Truck dealership, to the east by undeveloped land, to the south by the Southern Pacific Railroad and Route 80, and to the west by Highway 111 and undeveloped land. (4)

Currently, about 5 acres of the site contain an office building, a residence, a large metal works building, a small copper storage building, a truck scale, a large automobile compactor, and a small bailing machine shop. The remaining 48 acres of the site are used to store scrap metal products, which include old automobiles, empty storage tanks, and scrap metal. Approximately 90 percent of the site is unpaved. A fence, topped with barbed wire, encloses the entire 53-acre site. (4)

2.3 Operational History

Prior to 1957, site operations consisted of a metal salvage business. In 1957, when the current owner of Valley Iron and Metal purchased and moved onto the 53-acre site, operations remained the same. Additional information on the past owners of the site is not known at this time. (4)

Currently, the site operates as a metal salvage yard. Scrap metal is brought on site, weighed, separated, stored, and shipped offsite to a recycling facility. During the BEI site reconnaissance visit conducted on May 23, 1994, 55-gallon drums of unknown contents, automobiles, refrigerators, miscellaneous sizes of wire, large storage tanks, and various miscellaneous pieces of scrap metal were stored in piles on the unpaved yard. In the western portion of the site a large automobile compactor and a baling machine operate to compress and bail scrap metals for shipment off site. There is also a large metal shop building, where purchased metal pieces are brought on site and modified to various sizes for sale. At the time of the site visit, no hazardous substances were used or generated in onsite operations. (4)

According to a representative from the Imperial County Division of Environmental Health Services, electric transformers and automobile batteries were historically stored on site for eventual offsite recycling. Although documentation of this activity is lacking, analytical results of soil sampling in 1991, from an onsite soil pile, indicated the presence of lead and polychlorinated biphenyls in onsite soils. These results indicate that transformers and batteries may have at one time been stored on site. (5)

In 1991, at the request of the Imperial County Division of Environmental Health Services, the site operator employed a private consultant to collect six soil samples from a waste soil pile observed during an inspection of the Valley Iron and Metals site. Soils samples were analyzed for metals using EPA Method 6010. Analytical results indicated arsenic at concentrations up to 19.8 milligrams per kilogram (mg/kg), cadmium at concentration up to 38.1 mg/kg, total chromium at concentrations up to 138 mg/kg, lead at concentrations up to 1,910 mg/kg, and PCBs at concentrations up to 18,500 micrograms per kilogram. No background samples were collected at that time and the quality of the data is not known. (2) In January 1992, the soil pile was removed from the site by a licensed waste hauler and taken to a permitted treatment and disposal facility in Westmorland, Calif. (6) It is not known if confirmatory soil samples were collected and analyzed after the removal to verify cleanup of the contaminated soils.

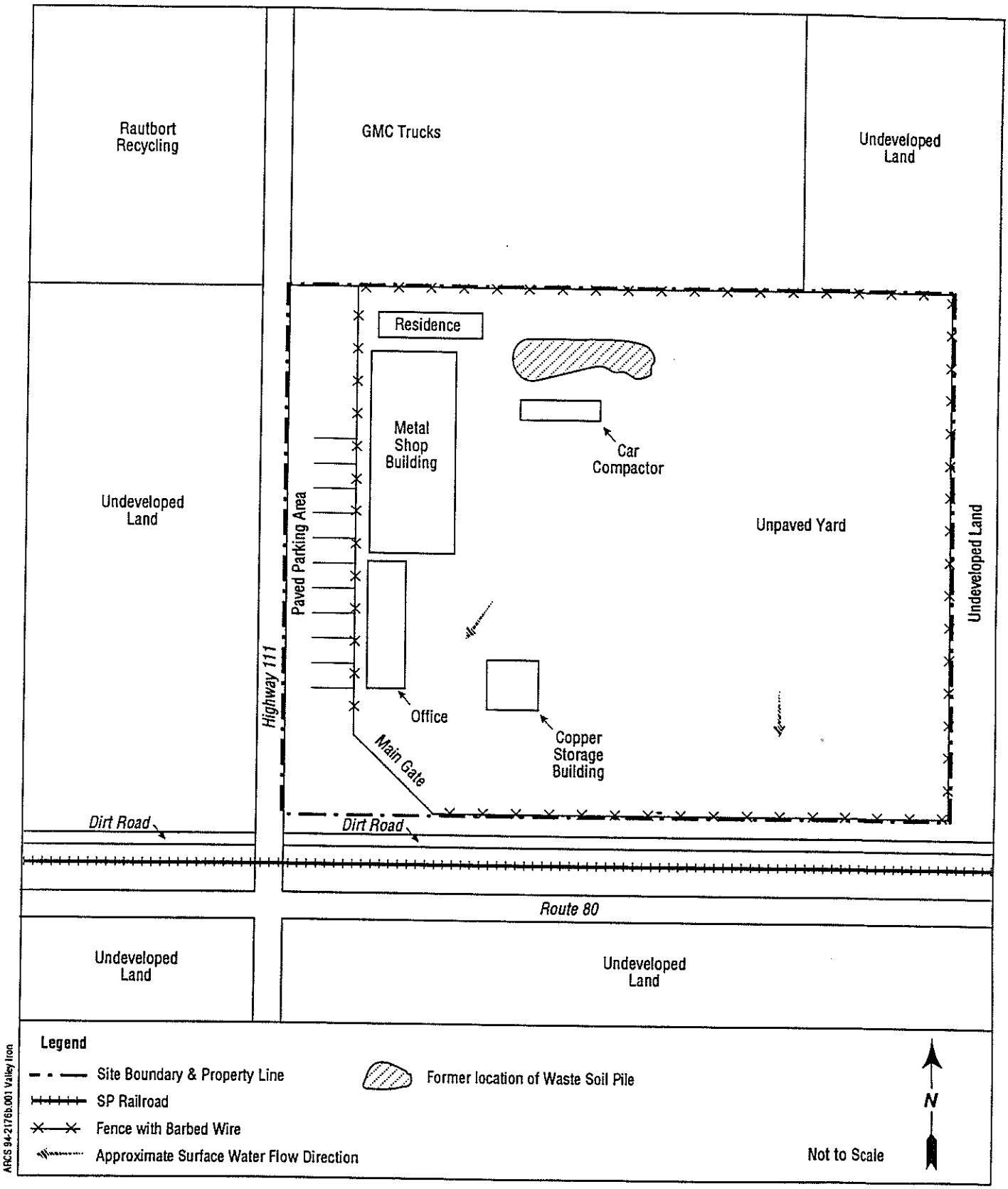


Figure 2-2 Site Layout

2.4 Regulatory Involvement

2.4.1 U.S. Environmental Protection Agency (EPA). The Valley Iron and Metal site is not listed in the Resource Conservation Recovery Information System (RCRIS) database as of April 15, 1994. (7)

2.4.2 California Environmental Protection Agency. The Department of Toxic Substances Control (DTSC, formerly known as the Department of Health Services, Toxic Substances Control Division), Region 4, and the Regional Water Quality Control Board (RWQCB), Colorado River Basin Region do not have files on the Valley Iron and Metal site. (8,9)

2.4.3 Imperial County Division of Environmental Health Services (DEHS). In 1991, the Imperial County Division of Environmental Health Services representative visited the Valley Iron and Metal site and observed a large pile of soil in the northwestern corner of the site. As a result of the observations and recommendations by DEHS, six soil samples were collected by a consulting company for the site operators to determine if the soil pile contained hazardous substances. Analytical results from the six soil samples indicated the presence of arsenic, cadmium, lead, mercury, and PCBs. The soil pile was removed from the site in January 1992, and there has been no further involvement by the DEHS with the site. (2)

3.0 HAZARD RANKING SYSTEM FACTORS

3.1 Sources of Contamination

The following potential hazardous substances sources are associate with the site:

- The entire unpaved storage yard used to store various metal products for recycling is being considered as a possible source of soil contamination. Although there is no direct or written evidence documenting that batteries and transformers were stored on site, analytical sampling data from a waste soil pile onsite indicates that these materials may have been at one time handled at the site. Because the exact storage location of these materials is not known, it is assumed that the entire 53 acres of unpaved soil at the site may be a potential source of contamination. (4)

3.2 Groundwater Pathway

Groundwater beneath the site is first encountered at a depth between 8 feet and 20 feet below ground surface. The groundwater quality is unsuitable for human consumption or agricultural purposes due to the brackish nature of the water. There are no municipal drinking water wells within four miles of the site. According to a representative from the Water Treatment Facility in El Centro groundwater movement beneath the Valley Iron and Metal site is nearly static. (10)

3.3 Surface Water Pathway

Surface water runoff from the site flows to the south and southwest onto exposed barren soils adjacent to the site. During periods of heavy rainfall, a drainage ditch parallel to the dirt road and the Southern Pacific Railroad collects surface water runoff from the site. There are no surface water bodies within two miles of the site. (4) There are no sensitive environments within 15 miles of the site. (11)

3.4 Soil Exposure and Air Pathway

*3.4.1 **Physical Conditions.*** The site is in a mixed rural-agricultural area approximately 3 miles east of El Centro. The parking lot and the first 40 feet of the main entrance are paved while all the other out-of-doors surface areas within the site are unpaved. All onsite operations occur outdoors within the unpaved yard. The site includes various sized piles of recyclable scrap metal stored in unpaved areas. (4)

*3.4.2 **Soil and Air Targets.*** The number of workers on site is approximately 17. The only onsite residence is a mobile home, used by the night-watch person. No schools or daycare centers are on the property or within 200 feet of contamination associated with the site. The nearest offsite residence is approximately 0.5 mile from the eastern site boundary. There are approximately 394 people living within one mile of the site. (4)

*3.4.3 **Soil Exposure and Air Pathway Conclusions.*** In 1991, six soil samples were collected from a soil pile onsite by a consultant for the site operator. Analytical results indicated the presence of arsenic at concentrations up to 19.8 milligrams per kilogram (mg/kg), cadmium at concentration up to 38.1 mg/kg, chromium at concentrations up to 138 mg/kg, lead at concentrations up to 1,910 mg/kg, and PCBs at concentrations up to 18,500 micrograms per kilogram. The sources of the arsenic, cadmium, chromium, lead, and PCBs are not known at this time. Because of a lack of documentation concerning past onsite operations, the entire site is considered to be a source of hazardous substances.

The number of workers on site is approximately 17. The only onsite residence is a mobile home, used by the night-watch person. No schools or daycare centers are on the property or within 200 feet of contamination associated with the site. The nearest offsite residence is approximately 0.5 mile from the eastern site boundary. There are approximately 394 people living within one mile of the site.

4.0 EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415 (b) (2)] authorizes the EPA to consider emergency response actions at sites that pose an imminent threat to human health or the environment. For the following reasons, a referral to Region IX's Emergency Response Section does not appear to be necessary:

- Currently, the site does not generate, receive, or store hazardous waste.
- The site is completely enclosed by a fence topped with barbed wire.

- There are no school or daycare centers onsite and within 200 feet of an area of soil contamination associated with this site.

5.0 SUMMARY

The Valley Iron and Metal site is located at 2004 Highway 111, El Centro, Imperial County, Calif.

The site occupies approximately 53 acres and is 3 miles east of El Centro in a mixed rural and agricultural area. The site is bordered to the north by a General Motors Truck dealership, to the east by undeveloped land, to the south by the Southern Pacific Railroad and Route 80, and to the west by Highway 111 and undeveloped land.

Currently, about 5 acres of the site contains an office building, a residence, a large metal works building, a small copper storage building, a truck scale, a large automobile compactor, and a small bailing machine shop. The remaining 48 acres of the site are used to store scrap metal products which include old automobiles, empty storage tanks, and scrap metal. Approximately 90 percent of the site is unpaved. A fence, topped with barbed wire, encloses the site the entire site.

Prior to 1957, site operations consisted of a metal salvage business. In 1957, when the current owner of Valley Iron and Metal purchased and moved on the 53-acre site, operations remained the same. Additional information on the past owners of the site is not known at this time.

Currently, the site operates as a metal salvage yard. Scrap metal is brought on site, weighed, separated, stored, and shipped offsite to a recycling facility. During the BEI site reconnaissance visit conducted on May 23, 1994, 55-gallon drums of unknown contents, automobiles, refrigerators, miscellaneous sizes of wire, large storage tanks, and various miscellaneous pieces of scrap metal were stored in piles on the unpaved yard. In the western portion of the site a large automobile compactor and a baling machine operate to compress and bail scrap metals for shipment off site. There is also a large metal shop building where purchased metal pieces are brought on site and modified to various sizes for sale. At the time of the site visit no hazardous substances were used or generated in onsite operations.

According to a representative from the Imperial County Division of Environmental Health Services, electric transformers and automobile batteries were historically stored on site for eventual recycling. Although documentation of this activity is lacking, analytical results of soil sampling in 1991, from an onsite soil pile, indicated the presence of lead and polychlorinated biphenyls in onsite soils. These results indicate that transformers and batteries may have at one time been stored on site.

In 1991, at the request of the Imperial County Division of Environmental Health Services, the site operator employed a private consultant to collect six soil samples from a waste soil pile observed during an inspection of the Valley Iron and Metals site. Soils samples were analyzed for metals using EPA Method 6010. Analytical results indicated arsenic at concentrations up to 19.8 milligrams per kilogram (mg/kg), cadmium at concentration up to 38.1 mg/kg, total chromium at concentrations up to 138 mg/kg, lead at concentrations up to 1,910 mg/kg, and PCBs at concentrations up to 18,500 micrograms per kilogram. No background samples were collected at that time and the quality of the data is not known. In January 1992, the soil pile was removed from the site by a licensed waste hauler and taken to a permitted treatment and disposal facility in

Westmorland, Calif. It is not known if confirmatory soil samples were collected and analyzed after the removal to verify cleanup of contaminated soils.

The following pertinent Hazard Ranking System factors are associated with the site:

- The groundwater migration pathway does not appear to be of concern because there are no municipal groundwater wells within 4 miles of the site. Furthermore, groundwater within 4 miles of the site is brackish and is not suitable for human consumption or agricultural purposes.

- The surface water migration pathway does not appear to be of concern because there are no surface water bodies within 2 miles of the site.

- The soil exposure pathway does not appear to be of concern because, although analytical results of an onsite soil pile indicated the presence of heavy metals and polychlorinated biphenyls, the soil pile was removed from the site to a permitted treatment and disposal facility in 1992. Additionally, the entire site is enclosed by a fence and is therefore inaccessible to the public. Also, there are no schools or daycare centers on site.

- The air migration pathway does not appear to be of concern because there is no documentation supporting a release to air.

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: VALLEY IRON AND METAL (Edman Corp.) **EPA ID#:** CAD 000000115C

Alias Site Names:

City: El Centro **County or Parish:** Imperial **State:** CA

Refer to Report Dated: 6/17/94 **Report type:** Preliminary Assessment

Report developed by: Bechtel Environmental, Inc.

DECISION:

| ✓ | **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

| ✓ | 1a. Site does not qualify for further remedial site assessment under CERCLA (Site Evaluation Accomplished - SEA)

| | | 1b. Site may qualify for further action, but is deferred to: | | | RCRA | | | NRC

| | | **2. Further Assessment Needed Under CERCLA:** 2a. (optional) Priority: | | Higher | | | Lower

2b. Activity Type: | | PA | | | ESI | | | SI | | | HRS evaluation

| | | Other:

DISCUSSION/RATIONALE:

Report Reviewed, Approved, and Site Decision Made by: C Temple **Signature:** C Temple **Date:** 6/29/94

APPENDIX A

REFERENCE LIST

Site: Valley Iron and Metal (Edman Corp.)

1. U.S. Environmental Protection Agency, Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), May 5, 1994.

2. Valentine, David W., Tetra Tech, Inc., Soil Sampling Report sent to Louie Ramirez, Edman Corporation, July 3, 1991.

3. U.S. Geological Survey, El Centro Quadrangle, California, 7.5-Minute Series (topographic), Photorevised 1979.

4. Wilson, Eric S., Bechtel Environmental, Inc., Site Reconnaissance Interview and Observation Report, May 23, 1994.

5. Johnston, Mark, Department of Health Services, Imperial County Division of Environmental Health Services, Discussion with Eric S. Wilson, Bechtel Environmental, Inc., recorded on Contact Log, April 20, 1994.

6. Uniform Hazardous Waste Manifest, Signed by Luis E. Ramirez, Valley Iron and Metal, January 21, 1992.

7. U.S. Environmental Protection Agency, Resource Conservation and Recovery Act Notifiers List, Region IX Database, April 15, 1994.

8. Johnson, Julie, California Environmental Protection Agency, Department of Toxic Substances Control, Region 4, Discussion with Eric S. Wilson, Bechtel Environmental, Inc., recorded on Contact Log, April 22, 1994.

9. Rodriguez, Ron, California Environmental Protection Agency, Regional Water Quality Control Board, Colorado River Basin Region, Discussion with Eric S. Wilson, Bechtel Environmental, Inc., recorded on Contact Log, April 22, 1994.

10. Steward, Paul, Water Treatment Facility, Telephone conversation recorded on Contact Report by Eric S. Wilson, Bechtel Environmental, Inc., June 2, 1994.

11. National Diversity Database, California Department of Fish and Game, 1991.

APPENDIX B
Photographic Documentation

1. Car compactor in the northwestern portion of the site (facing north).

2. Fifty-five gallon drums stored in the unpaved yard near the metal shop building (facing west).

3. Compacted metal is stored in the unpaved yard. Note the metal shop building in the background (facing west).

APPENDIX C

CONTACT LOG

Site: Valley Iron and Metal (Edman Corp.)

EPA ID: CA0 000001156

Name	Affiliation	Phone	Date	Information
Mark Johnston	Department of Health Services, Imperial County Division of Environmental Health Services (DEHS)	(619) 339-4203	4/20/94	Mr. Johnston explained that the DEHS does have a file on the site and an appointment has been arranged to view the file. Additionally, it was discovered during the phone conversation that the correct name of the facility is Edman Corp., not Rodman Corp. Mr. Johnston also explained that some contaminated soil at the site had to be deposited at a Class I landfill. He also explained that the facility used to recycle batteries and transformers. An appointment to review the file has been arranged.
Julie Johnson	California Environmental Protection Agency, Department of Toxic Substances Control DTSC), Region 4	(310) 590-4980	4/22/94	The DTSC does not have any files on the Valley Iron and Metal site.
Ron Rodriguez	California Environmental Protection Agency, Regional Water Quality Control Board (RWQCB), Colorado River Basin Region	(619) 776-8944	4/22/94	The RWQCB does not maintain a file on this site and the agency is not involved with any regulatory activity with the Valley Iron and Metal site.
Paul Steward	Water Treatment Facility	(619) 337-4575	6/2/94	See Contact Report.

APPENDIX D

A185 0002

CONTACT REPORT

AGENCY/AFFILIATION: Water Treatment Facility		CODE: GW
DEPARTMENT: NA		
ADDRESS: P.O. Box 4450	CITY: El Centro	
COUNTY: Imperial	STATE: CA	ZIP: 92244
CONTACT(S) Paul Steward	TITLE Supervisor	PHONE (619) 337-4575
BEI PERSON MAKING CONTACT: Eric S. Wilson EW		DATE: 6/2/94
SUBJECT: Groundwater use in Imperial Valley		
SITE NAME: Valley Iron and Metal (Edman Corp.)	EPA ID: CA0 000001156	

DISCUSSION:

There are no municipal wells within 4 miles of the Valley Iron and Metal site, which is located at the intersection of Highways 111 and 80. Groundwater in the area is not suitable for human consumption or agricultural purposes because the groundwater is brackish. In addition, since topography in the Imperial Valley is relatively flat, groundwater does not move in any lateral direction.

People in the Imperial Valley receive drinking water from the Colorado River. Surface water is brought to the valley by way of a canal system. There are approximately 100,000 people in Imperial Valley that receive drinking water from the canal system.

The depth to groundwater in the vicinity of the site varies between 8 to 20 feet below ground surface.

CONTACT CONCURRENCE: _____ **DATE:** _____

APPENDIX E

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Bechtel Environmental, Inc.
P.O. Box 193965
San Francisco, CA 94119-3965

OBSERVATIONS MADE BY: Eric S. Wilson DATE: May 23, 1994

FACILITY REPRESENTATIVE(S) and TITLE(S):

Louie Ramirez, President
Ken Mack, Southwest Regional Manager

SITE: Valley Iron and Metal (Edman Corp.)

EPA ID: CA0 000001156

A site reconnaissance was conducted at the Valley Iron and Metal site on May 23. The weather was sunny and the temperature was approximately 85°F. The Bechtel Environmental, Inc. (BEI) representative, Eric S. Wilson, conducted the site reconnaissance with Mr. Ramirez and Mr. Mack at 1 p.m. to gather information on the site location and size, site history, processes used, and any hazardous waste generated, treated, stored, or disposed of on site. The BEI representative was provided with a packet of information prepared in response to BEI's letter dated April 21. The reconnaissance included a site tour during which photographs were taken.

The following information was obtained during the site reconnaissance:

The site occupies approximately 53 acres, 3 miles east of El Centro in a mixed rural-agricultural area. The site is bordered to the north by a General Motors Truck dealership, to the east by undeveloped land, to the south by the Southern Pacific Railroad and Route 80, and to the west by Highway 111 and undeveloped land.

Currently, about 5 acres of the site consists of an office building, a residence, a large metal works building, a small copper storage building, a truck scale, a large automobile compactor, and a small bailing machine shop. The remaining 48 acres of the site are used to store scrap metal products which range from old automobiles to empty storage tanks to scrap metal. Approximately 90 percent of the site is unpaved. A fence topped with barbed wire, encloses the site.

Prior to 1957, site operations consisted of a metal salvage business. In 1957, when the current owner of Valley Iron and Metal purchased and moved onto the 53 acre site, operations remained the same. Additional information on the past owners of the site is not known at this time.

Currently the site operates as a metal salvage yard. Scrap metal is brought on site, weighed, separated, stored, and shipped off site to a recycling facility. During the site reconnaissance, 55-gallon drums of unknown contents, automobiles, refrigerators, odd sizes of wire, large storage

tanks, and various odd pieces of scrap metal were stored in piles on the unpaved yard. In the western portion of the site, a large automobile compactor and a baling machine operate to compress and pack scrap metals for shipment off site. There is also a large metal shop building where purchased metal pieces are brought on site and modified to various sizes for sale. At the time of the site visit no hazardous substances were used or generated in onsite operations.

Surface water runoff from the site flows to the south and southwest onto exposed barren soils adjacent to the site. During periods of heavy rainfall, a drainage ditch parallel to the dirt road and the Southern Pacific Railroad collects surface water runoff from the site. There are no surface water bodies within 2 miles of the site.

The site is in a mixed rural-agricultural area approximately 3 miles east of El Centro. The parking lot and the first 40 feet of the main entrance are paved while all the other out-of-doors surface areas within the site are unpaved. All onsite operations occur outdoors within the unpaved yard. The site consists of various sized piles of recyclable scrap metal stored in unpaved areas.

The number of workers on site is approximately 17. The only onsite residence is a mobile home used by the night watch person. No schools or daycare centers are on the same property and within 200 feet of contamination associated with the site. The nearest offsite residence is approximately 0.5 mile from the eastern site boundary.

Bechtel

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San Francisco, CA 94105-1895
Mailing address: P.O. Box 193965
San Francisco, CA 94119-3965

REFERENCES
for

Preliminary Assessment

Site: Valley Iron and Metal (Edman Corp.)
2004 Highway 111
El Centro, Calif. 92243

Site EPA ID Number: CA0 000001156

Work Assignment Number: 60-32-9JZZ, ARCSWEST Program

Submitted to: Sandra Carroll
Work Assignment Manager
EPA Region IX

Date: June 17, 1994

Prepared by: Eric S. Wilson

Review and Concurrence: Catherine C. Walton

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Site: Valley Iron and Metal (Edman Corp.)

1. U.S. Environmental Protection Agency, Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), May 5, 1994.

2. Valentine, David W., Tetra Tech, Inc., Soil Sampling Report sent to Louie Ramirez, Edman Corporation, July 3, 1991.

3. U.S. Geological Survey, El Centro Quadrangle, California, 7.5-Minute Series (topographic), Photorevised 1979.

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7. U.S. Environmental Protection Agency, Resource Conservation and Recovery Act Notifiers List, Region IX Database, April 15, 1994.

8. Johnson, Julie, California Environmental Protection Agency, Department of Toxic Substances Control, Region 4, Discussion with Eric S. Wilson, Bechtel Environmental, Inc., recorded on Contact Log, April 22, 1994.

9. Rodriguez, Ron, California Environmental Protection Agency, Regional Water Quality Control Board, Colorado River Basin Region, Discussion with Eric S. Wilson, Bechtel Environmental, Inc., recorded on Contact Log, April 22, 1994.

10. Steward, Paul, Water Treatment Facility, Telephone conversation recorded on Contact Report by Eric S. Wilson, Bechtel Environmental, Inc., June 2, 1994.

11. National Diversity Database, California Department of Fish and Game, 1991.

EPA REGION IX - CERCLIS REPORT
LIST-8 FOR REGION IX
SORTED BY SITENAME

EPA ID NO.	SITE NAME STREET CITY, COUNTY CODE & NAME	STATE ZIP CONG DIST.	EVENT QUALIF	OP UN	EVENT TYPE	ACTUAL START DATE	ACTUAL COMPL DATE	CURRENT EVENT LEAD	NPL
	037 LOS ANGELES	CA-21		00	DS1		01/04/90	STATE(FUND)	0
CAD069127470	VALLEY GARDENS GOLF COURSE 263 MT HERMAN RD SCOTTS VALLEY 087 SANTA CRUZ	CA 95066 CA-16	L H H N	00	DS1 PA1 SI1 SI2 SI3	10/01/85	07/01/85 10/01/85 10/01/85 12/07/89 10/25/91	EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND)	N N N N
CA0000001156	VALLEY IRON AND METAL (RODMAN CORP.) 2004 HIGHWAY 111 EL CENTRO 025 IMPERIAL	CA 92243 CA-45		00	DS1		09/21/93	EPA (FUND)	N
CAD055556062	VALLEY PLATING CO 3872 EL CAJON CENTRAL VALLEY 089 SHASTA	CA 96019 CA-01	L N	00	DS1 PA1 PA2		12/01/79 02/01/81 05/17/89	EPA (FUND) EPA (FUND) EPA (FUND)	N N N
CAD982415739	VALLEY PROPELLER 300 WATTS DR BAKERSFIELD 029 KERN	CA 93307 CA-17	N	00	DS1 PA1		12/01/87 06/30/89	EPA (FUND) EPA (FUND)	N N
CAD980131486	VALLEY WASTE DSPL CO (W 6 OTHERS) SEC 8 T29S R28E KERN RIV FLD BAKERSFIELD (5 MI N OF) 029 KERN	CA 93308 CA-18	L N	00	DS1 PA1 PA2		12/01/79 06/01/80 01/17/90	EPA (FUND) EPA (FUND) EPA (FUND)	N N N
CAD063020143	VALLEY WOOD PRESERVING INC 2237 S GOLDEN STATE BLVD TURLOCK 099 STANISLAUS	CA 95380 CA-18	H	00	HR1 SI1 DS1		06/01/83 04/01/84 09/01/79	EPA (FUND) EPA (FUND) EPA (FUND	F F

REFERENCE 1

TETRA TECH, INC.
9645 Scranton Road, Suite 200
San Diego, CA 92121
Telephone (619) 450-0365

3 July 1991

Mr. Louie Ramirez
Edman Corporation
P.O. Box 3356
El Centro, CA 92244

Subject: Soil Sampling

Dear Mr. Ramirez:

On 30 May 1991 I provided you with a proposal to sample a soil waste pile on your property. The basic purpose of our investigation was to determine whether this soil was considered non-hazardous according to State of California criteria.

On 5 June Mr. J. R. Hollingsworth of our office obtained six discrete samples from the waste pile. Mr. Scott Baur of Laidlaw Environmental Services witnessed sampling. The samples were placed in wide mouth glass jars with teflon liners and transported in a refrigerated condition to Quality Assurance Laboratory, the state certified laboratory that performed the analyses. QAL was given instructions, in the chain of custody document, to run an EPA Method 418.1, total recoverable petroleum hydrocarbons (TRPH) on each of these samples and to composite samples ST-2, ST-18 and ST-40 for additional tests. The TRPH concentration of the resulting composite was 320,000 mg/kg.

QAL was instructed to perform the following tests on this composite:

EPA Method 8010
EPA Method 8020
EPA Method 8080
TTLC Metals
TCLP organic/inorganic
Cyanide
Flash point
pH
Sulfide
Organic lead
Fish bioassay

These tests were designed to specifically address the question as to whether the hydrocarbon contaminated soil would be classified as

a "hazardous waste" under Article 11, Division 4, Title 22 of the California Code of Regulations. Such waste is not regulated under Federal law (ie., is a non-RCRA waste). To presumptively be classified as a hazardous waste under California law (or, alternatively, to be classified as a non-hazardous waste and be exempt) requires that these basic criteria be examined. Failure to pass any of these criteria is sufficient to classify the waste as hazardous.

66696 Toxicity Criteria

The toxicity of soil was explored using fathead minnows (Pimephales promelas) as test organisms over a 96 hour period. Three of the fish in the highest treatment level died, but two of the control fish also died. The 50 percent confidence interval for the LC50 was uniformly greater than 750 mg/l. This soil is not toxic according to this test.

66699 Persistent and Bioaccumulative Toxic Substance

This section addresses both organic and inorganic compounds that are either, or have the potential to be, persistent and/or accumulate in food chains. The concentration of inorganic compounds of concern is determined using a Total Threshold Limit Concentration (TTLC) test. The results of this test are summarized in Table 1. Both lead and zinc exceed state mandated TTLC levels and would normally be considered hazardous.

A test was also run for organic lead. The state action level for organic lead is 11 mg/kg. The Department of Health Services method used to test this sample detected 60.0 mg/kg. The soil would, then, be considered hazardous based on organic lead content.

The presence of bioaccumulative chlorinated organics was addressed using EPA Methods 8010 and 8080. None of the target compounds was detected in the first test. EPA Method 8080 detected two compounds of potential concern, 4,4'-DDD at 94.0 ug/kg and PCBs at 18,500 ug/kg. The state TTLC action levels for DDD is 1,000 ug/kg and 50,000 ug/kg for PCBs. This material would not, then, likely be considered hazardous based on DDD and PCB content.

A Federal Toxic Concentration Leaching Potential (TCLP) test was likewise run on this sample. Of the 38 organic and inorganic target compounds tested for only two, barium and methyl ethyl ketone (MEK), were found above method detection limits. Barium was present at a concentration of 0.15 percent of the regulatory level while MEK was present at a level of 0.63 percent. The material is not, then, toxic according to TCLP criteria.

66702 Ignitability Criteria

The ignitability criteria is not strictly applicable to fuel contaminated soils. However, a flash point test was run on the composite. The flash point was above 212 deg F. Only compounds with a flash point of <140 deg F are considered ignitable under this section. Therefore, the waste pile passed the ignitability criteria.

66705 Reactivity Criteria

Hydrocarbon contaminated soil is normally stable and does not reacts violently with water. Further, the cyanide levels was low (0.70 mg/kg) and contained no detectable sulfides (<22 mg/kg). The pH of the pile is essentially normal (7.04, pure water has a pH of 7.00).

66708 Corrosivity Criteria

To be considered corrosive the pH of a mixture must be less than 2 or greater than or equal to 12.5. The pH of this soil pile was 7.04. The pile is not corrosive.

In summary, the soil piles does not seem to be a hazardous waste according to most criteria as defined in the previously referenced CCR code section. The pile does, however, contain lead, organic lead and zinc at levels considered hazardous. Whether the San Diego Department of Health Services (Hazardous Materials Management Division) will allow the transportation of this waste to Laidlaw's hazardous waste disposal facility as a non-hazardous waste is problematical.

Please do not hesitate to contact me should you have any questions.

Yours truly,

David W. Valentine, Ph.D.
Senior Program Director

DWV:vvv/edman-se.lf

cc: S. Baur, Laidlaw

Attachments:

1. Quality Assurance Laboratory chain of custody document dated 5 June 1991 and laboratory results for QAL log numbers 7993-91 through 7998-91 dated 21 June 1991.

2. Quality Assurance Laboratory chain of custody document dated 7 June 1991 and results from Environmental and Energy Services Co. dated 25 June 1991 for Quality Assurance Laboratory soil samples 7933/7998 comp.

Table 1: Comparison of TTLC Values

Substance	State TTLC Exceedance Criteria, mg/kg	TTLC Soil Values, mg/kg
Antimony	500	<2.45
Arsenic	500	19.8
Barium	10,000	988
Beryllium	75	0.306
Cadmium	100	38.1
Chromium (total)	2,500	138
Cobalt	8,000	48.0
Copper	2,500	958
Lead	1,000	1,910.
Mercury	20	3.00
Molybdenum	3,500	<0.245
Nickel	2,000	192
Selenium	100	<2.45
Silver	500	2.84
Thallium	700	32.8
Vanadium	2,400	19.5
Zinc	5,000	14,000

ATTACHMENT 1

QUALITY ASSURANCE LABORATORY CHAIN OF CUSTODY DOCUMENT DATED 5 JUNE 1991 LABORATORY RESULTS FOR QAL LOG NUMBERS 7993-91 THROUGH 7998-91 DATED 21 JUNE 1991.

QUALITY ASSURANCE LABORATORY
6605 NANCY RIDGE DRIVE
SAN DIEGO, CALIFORNIA 92121
(619) 552-3636

TETRA TECH
ATTN: J. R. HOLLINGWORTH
9645 SCRANTON ROAD #200
SAN DIEGO, CA 92121

DATE OF REPORT	JUNE 21, 1991
DATE RECEIVED	JUNE 5, 1991
DATE OF SAMPLE	JUNE 5, 1991
DATE COMPLETED	PARTIAL REPORT
ANALYZED BY	DH GB MM VJ EA PL MC JM
SAMPLE TYPE	6 SOIL
PROJECT NAME	EL CENTRO

ANALYSES RESULTS

LOG NUMBER	SAMPLE ID	ANALYSIS: TRPH METHOD: EPA 418.1 UNITS: MG/KG	DF
7993-91	ST-2	216,000	2,500
7994-91	ST-18	352,000	2,500
7995-91	ST-24	392,000	2,500
7996-91	ST-35	382,000	2,500
7997-91	ST-40	392,000	2,500
7998-91	ST-60	403,000	2,500

TRPH - TOTAL RECOVERABLE PETROLEUM HYDROCARBONS

DF = DILUTION FACTOR. THE DETECTION LIMITS AND ANALYSIS RESULTS WERE CORRECTED ACCORDINGLY.

PETER SHEN
LABORATORY DIRECTOR

PS/ft

QUALITY ASSURANCE

JUNE 21, 1991

TETRA TECH
ANALYSES RESULTS
SAMPLE TYPE - SOIL

ANALYSIS	METHOD	UNITS	LOG NUMBER: 7993-91 SAMPLE ID: ST-2,ST-18,ST-40	DF
CYANIDE	SW846-9010	MG/KG	0.70	10
FLASHPOINT	SW846-1010	DEGREES F	>212	
PH	SW846-9045	UNITS	7.04	
SULFIDE	MOD AOAC-1.013	MG/KG	<22	10
BENZENE	EPA 8020	UG/KG	<5.0	
TOLUENE	EPA 8020	UG/KG	58.6	
ETHYLBENZENE	EPA 8020	UG/KG	21.0	5
XYLENE	EPA 8020	UG/KG	76.6	5
ORG. LEAD	DHS	MG/KG	60.0	10

DHS - RECOMMENDED PROCEDURE FROM LEAKING UNDERGROUND FUEL TANK FIELD MANUAL, MAY 1988

DF = DILUTION FACTOR. THE DETECTION LIMITS AND ANALYSIS RESULTS WERE CORRECTED ACCORDINGLY.

PETER SHEN
LABORATORY DIRECTOR

PS/ft

QUALITY ASSURANCE

JUNE 21, 1991

TETRA TECH
TITLE 22 - METALS (TTLC)
SAMPLE TYPE - SOIL

ANALYSIS	METHOD	LOG NUMBER: 7993-91 SAMPLE ID: ST-2,ST-18,ST-40 UNITS: MG/KG
ANTIMONY	6010	<2.45
ARSENIC	6010	19.8
BARIUM	6010	988
BERYLLIUM	6010	0.306
CADMIUM	6010	38.1
CHROMIUM	6010	138
COBALT	6010	48.0
COPPER	6010	958
LEAD	6010	1,910
MERCURY	7471	3.00
MOLYBDENUM	6010	<0.245
NICKEL	6010	192
SELENIUM	6010	<2.45
SILVER	6010	2.84
THALLIUM	6010	32.8
VANADIUM	6010	19.5
ZINC	6010	14,000

PETER SHEN
LABORATORY DIRECTOR

PS/ft

QUALITY ASSURANCE

JUNE 21, 1991

TETRA TECH
ANALYSES RESULTS
SAMPLE TYPE - SOIL

TOXICITY CHARACTERISTIC CONSTITUENTS AND REGULATORY LEVELS

ANALYSES	EPA METHOD	UNITS	REGULATORY LEVEL	LOG NUMBER: 7993-91 SAMPLE ID: ST-2,ST-18,ST-40
ARSENIC	6010	MG/L	5.0	<0.550
BARIUM	6010	MG/L	100	0.151
BENZENE	8240	UG/L	500	< 4.4
CADMIUM	6010	MG/L	1.0	<0.088
CARBON TETRACHLORIDE	8240	UG/L	500	< 2.8
CHLORDANE	8080	UG/L	30.0	< 1.0
CHLOROBENZENE	8240	UG/L	100,000	< 6
CHLOROFORM	8240	UG/L	600	< 1.6
CHROMIUM	6010	MG/L	5.0	<0.055
TOTAL CRESOLS	8270	UG/L	200,000	< 40
2,4-D	8150	UG/L	10,000	< 0.04
1,4-DICHLOROBENZENE	8270	UG/L	7,500	< 17.6
1,2-DICHLOROBENZENE	8270	UG/L	500	< 7.6
1,1-DICHLOROETHYLENE	8240	UG/L	700	< 2.8
2,4-DINITROTOLUENE	8270	UG/L	130	< 22.8
ENDRIN	8080	UG/L	20.0	<0.008
HEPTACHLOR	8080	UG/L	8.0	<0.003
HEPTACHLOR EPOXIDE	8080	UG/L	8.0	<0.005
HEXACHLOROBENZENE	8270	UG/L	130	< 7.6
HEXACHLORO-1,3-BUTADIENE	8270	UG/L	500	< 3.6
HEXACHLOROETHANE	8270	UG/L	3,000	< 6.4
LEAD	6010	MG/L	5.0	<0.275
LINDANE	8080	UG/L	400	<0.006
MERCURY	7470	MG/L	0.2	<0.010
METHOXYCHLOR	8080	UG/L	10,000	< 1.0
METHYL ETHYL KETONE	8240	UG/L	200,000	1266
NITROBENZENE	8270	UG/L	2,000	< 7.6
PENTACHLOROPHENOL	8270	UG/L	100,000	< 14.4
PYRIDINE	8270	UG/L	5,000	< 400
SELENIUM	6010	MG/L	1.0	<0.550
SILVER	6010	MG/L	5.0	<0.044
TETRACHLOROETHYLENE	8240	UG/L	700	< 4.1
TOXAPHENE	8080	UG/L	500	< 1.0
TRICHLOROETHYLENE	8240	UG/L	500	< 1.9
2,4,5-TRICHLOROPHENOL	8270	UG/L	400,000	< 40
2,4,6-TRICHLOROPHENOL	8270	UG/L	2,000	< 10.8
2,4,5-TP (SILVEX)	8150	UG/L	1,000	< 0.05
VINYL CHLORIDE	8240	UG/L	200	< 13

PETER SHEN
LABORATORY DIRECTOR

PS/ft

QUALITY ASSURANCE

JUNE 21, 1991

TETRA TECH
EPA METHOD 8010
PURGEABLE HALOCARBONS
SAMPLE TYPE - SOIL

ANALYSIS	DETECTION LIMIT UG/KG	7993-91 ST-2,ST-18,ST-40 UG/KG
DICHLORODIFLUOROMETHANE	45.0	ND
CHLOROMETHANE	2.0	ND
VINYL CHLORIDE	4.5	ND
BROMOMETHANE	29.5	ND
CHLOROETHANE	13.0	ND
TRICHLOROFLUOROMETHANE	12.5	ND
1,1-DICHLOROETHENE	3.3	ND
METHYLENE CHLORIDE	6.0	ND
trans-1,2-DICHLOROETHENE	2.5	ND
1,1-DICHLOROETHANE	1.8	ND
CHLOROFORM	1.3	ND
1,1,1-TRICHLOROETHANE	0.8	ND
CARBONTETRACHLORIDE	3.0	ND
1,2-DICHLOROETHANE	0.8	ND
TRICHLOROETHENE	3.0	ND
1,2-DICHLOROPROPANE	1.0	ND
BROMODICHLOROMETHANE	2.5	ND
2-CHLOROETHYLVINYL ETHER	3.3	ND
cis-1,3-DICHLOROPROPENE	8.5	ND
trans-1,3-DICHLOROPROPENE	5.0	ND
1,1,2-TRICHLOROETHANE	0.5	ND
TETRACHLOROETHENE	0.8	ND
DIBROMOCHLOROMETHANE	2.3	ND
CHLOROBENZENE	6.0	ND
BROMOFORM	5.0	ND
1,1,2,2-TETRACHLOROETHANE	0.8	ND
1,3-DICHLOROBENZENE	8.0	ND
1,4-DICHLOROBENZENE	6.0	ND
1,2-DICHLOROBENZENE	3.8	ND

SAMPLE DILUTED BY A FACTOR OF 5.
THE DETECTION LIMITS AND ANALYSIS RESULTS WERE CORRECTED ACCORDINGLY

ND = NONE DETECTED

PETER SHEN
LABORATORY DIRECTOR

PS/ft

JUNE 21, 1991

TETRA TECH
EPA METHOD 8080
ORGANOCHLORINE PESTICIDES AND PCBs
SAMPLE TYPE - SOIL

ANALYSIS	DETECTION LIMIT UG/KG	7993-91 ST-2,ST-18,ST-40 UG/KG
4,4' - DDD	0.5	94.0
4,4' - DDE	0.5	ND
4,4' - DDT	0.4	ND
ALDRIN	0.2	ND
ALPHA-BHC	0.6	ND
BETA-BHC	0.6	ND
CHLORDANE	25	ND
DELTA-BHC	0.6	ND
DIELDRIN	0.3	ND
ENDOSULFAN I	0.3	ND
ENDOSULFAN II	0.5	ND
ENDOSULFAN SULFATE	0.4	ND
ENDRIN	0.4	ND
ENDRIN ALDEHYDE	0.5	ND
HEPTACHLOR	0.2	ND
HEPTACHLOR EPOXIDE	0.3	ND
GAMMA-BHC	0.3	ND
TOXAPHENE	25	ND
PCB-1016	50	ND
PCB-1221	50	ND
PCB-1232	50	ND
PCB-1242	50	18,500*
PCB-1248	50	ND
PCB-1254	50	*
PCB-1260	50	ND

ND = NONE DETECTED

* THE RESULT IS A COMBINED TOTAL OF PCB 1242 & PCB 1254.

PETER SHEN
LABORATORY DIRECTOR

PS/ft

Quality Assurance Laboratory
6605 Nancy Ridge Drive
San Diego, CA 92121 (619) 552-3636

CHAIN OF CUSTODY

Date: 6/7/91 Page 1 of 1

COMPANY: QMAS
PROJECT MANAGER: Mary Simpson
ADDRESS:
PHONE: (619) 552-3636 x 302

PROJECT NAME: [illegible]
BILL TO: [illegible]
ADDRESS:
PHONE: PO #: 91763

NUMBER OF CONTAINERS

LAB LOG #	SAMPLE ID	SAMPLE DATE	SAMPLE TIME	SAMPLE MATRIX	CONTAINER TYPE	NUMBER OF CONTAINERS	Fil / TCP																
	7993 [illegible]	6/7/91		Soil	Jar	1	X																
	[illegible]	5/28/91		"	"	1	X																
	7? 20 [illegible]	5/28/91		"	"	1	X																

SAMPLE INTEGRITY

CORRECT CONTAINERS: [illegible] HOLDING TIME: [illegible]

Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N

SIGNATURE: [illegible] SIGNATURE: [illegible] DATE:
PRINTED NAME: [illegible] PRINTED NAME: [illegible] TIME:
COMPANY: [illegible] COMPANY: [illegible]

SIGNATURE: [illegible] SIGNATURE: [illegible] DATE:
PRINTED NAME: [illegible] PRINTED NAME: [illegible] TIME:
COMPANY: [illegible] COMPANY: ER[illegible]

[illegible] CONDITIONS:
RECEIVED ON ICE (YES) / NO
TAPE/SEAL INTACT YES / NO / (NA)
PRESERVATIVE YES / (NO)
PRECAUTIONS:

TAT REQUESTED: Normal

ALL SAMPLES [illegible] CONDITIONS ON [illegible]

Quality Assurance Laboratory
6605 Nancy Ridge Drive
San Diego, CA 92121 (619) 552-3636

CHAIN OF CUSTODY

Date: 5 June 91 Page 1 of 1

CUSTOMER INFORMATION

COMPANY: TETRA TECH INC
PROJECT MANAGER: J.R. HOLLINGSWORTH
ADDRESS:
PHONE: 450-0365

PROJECT INFORMATION

PROJECT NAME/NUMBER: EL CENTRO

BILLING INFORMATION

BILL TO:
ADDRESS:
PHONE: PO #:

ANALYSIS REQUEST

LAB LOG #	SAMPLE ID	SAMPLE DATE	SAMPLE TIME	SAMPLE MATRIX	CONTAINER TYPE	NUMBER OF CONTAINERS	418.1
93	ST-2	5 June		soil	glass	1	✓
94	ST-18	↓		↓	↓	1	✓
95	ST-24	↓		↓	↓	1	✓
96	ST-35	↓		↓	↓	1	✓
97	ST-40	↓		↓	↓	1	✓
98	ST-60	↓		↓	↓	1	✓

See attached quote as per Jr. Hollingsworth for additional analysis. Composite samples 2, 18, 40
mn

RECEIVED 5 JUN 91 P4:32

SAMPLE INTEGRITY

HOLDING TIME
CORRECT CONTAINER Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N

1. RELINQUISHED BY:	2. RELINQUISHED BY:	3. RELINQUISHED BY:
SIGNATURE: [signature] DATE: 6/5/91	SIGNATURE: DATE:	SIGNATURE: DATE:
PRINTED NAME: R Hollingsworth TIME: 1632	PRINTED NAME: TIME:	PRINTED NAME: TIME:
COMPANY: Tetra Tech Inc	COMPANY:	COMPANY:
1. RECEIVED BY:	**2. RECEIVED BY:**	**3. RECEIVED BY:**
SIGNATURE: John Edwardson DATE: 6/5/91	SIGNATURE: DATE:	SIGNATURE: DATE:
PRINTED NAME: John Edwardson TIME: 1632	PRINTED NAME: TIME:	PRINTED NAME: TIME:
COMPANY: QA Lab	COMPANY:	COMPANY:

SAMPLE RECEIPT

RECEIVED ON ICE (YES) / NO
TAPE SEAL INTACT YES / NO / (NA)
PRESERVATIVE YES / (NO)
PRECAUTIONS:

SPECIAL INSTRUCTIONS

TAT REQUESTED: Normal

— ALL SAMPLES ARE SUBJECT TO TERMS AND CONDITIONS

QUALITY ASSURANCE LABORATORY
QUALITY CONTROL DATA REPORT

JUNE 27, 1991

TETRA TECH
LOG #7993-91 THROUGH 7998-91
DATE EXTRACTED:
JUNE 10, 1991 - TRPH, ORGANIC LEAD
JUNE 12, 1991 - CYANIDE
DATE ANALYZED:
JUNE 11, 1991 - ORGANIC LEAD
JUNE 12, 1991 - CYANIDE, FLASHPOINT, TRPH

ANALYSES	METHOD	CCCV %RECOVERY	SPIKE %RECOVERY	DUPLICATE RPD
CYANIDE	9010	92%	92%	1%
FLASHPOINT	1010	101%		1%
TRPH	418.1	103%	105%	5%
ORGANIC LEAD	DHS	102%	100%	2%

Lisa MacClellan
LISA MACCLELLAN
QA/QC DIRECTOR

QUALITY CONTROL TERMINOLOGY

*CCCV-CONTINUING CALIBRATION CURVE VERIFICATION. REPORTED AS % RECOVERY OF AN INDEPENDENT STANDARD TO VERIFY LINEARITY OF THE OPERATING STANDARD CURVE. ACCEPTABLE RANGE IS 80%-120% RECOVERY.
*SPIKE-ENVIRONMENTAL SAMPLE IS MATRIX SPIKED WITH METHOD COMPOUNDS AND % RECOVERY OF CONCENTRATION SPIKED INTO SAMPLE IS CALCULATED. REPORTED AS % RECOVERY. ACCEPTABLE RANGE FOR "NORMAL MATRIX SAMPLES" IS 75%-125% RECOVERY.
*SURROGATES-COMPOUNDS REPRESENTATIVE OF A GROUP OF COMPOUNDS. SURROGATES ARE SPIKED INTO ENVIRONMENTAL SAMPLES AND % RECOVERY OF CONCENTRATION SPIKED IS CALCULATED AND REPORTED. ACCEPTABLE RANGE VARIES DEPENDING UPON SAMPLE MATRIX AND ANALYSES METHOD.

QUALITY CONTROL REPORT, CONTINUED
JUNE 27, 1991

TETRA TECH
SAMPLE LOG #7993-91 THROUGH 7998-91
DATE ANALYZED: JUNE 13, 1991

EPA METHOD 8020
Concentrations were calculated using a 4 point curve of concentrations- 2.5, 5, 10 and 20 ppb.

CONTINUING CALIBRATION CURVE VERIFICATION
A 15 ppb standard verification was run in the sample set up.

COMPOUND	%RECOVERY
Benzene	96%
Toluene	96%
Ethylbenzene	95%
Xylenes	98%

SPIKE DATA

Log# 8465-91 was spiked in duplicate with 15ppb 8020 standard.

COMPOUND	SPIKE % RECOVERY	RELATIVE % DIFFERENCE
Benzene	96%	12%
Toluene	96%	18%
Ethylbenzene	97%	15%
Xylenes	99%	13%

LISA MACCLELLAN
QA/QC DIRECTOR

QUALITY CONTROL TERMINOLOGY

*CCCV-CONTINUING CALIBRATION CURVE VERIFICATION. REPORTED AS % RECOVERY OF AN INDEPENDENT STANDARD TO VERIFY LINEARITY OF THE OPERATING STANDARD CURVE. ACCEPTABLE RANGE IS 80%-120% RECOVERY.
*SPIKE-ENVIRONMENTAL SAMPLE IS MATRIX SPIKED WITH METHOD COMPOUNDS AND % RECOVERY OF CONCENTRATION SPIKED INTO SAMPLE IS CALCULATED. REPORTED AS % RECOVERY. ACCEPTABLE RANGE FOR "NORMAL MATRIX SAMPLES" IS 75%-125% RECOVERY.

QUALITY CONTROL REPORT, CONTINUED
JUNE 27, 1991
SAMPLE LOG #7993-91 THROUGH 7998-91
DATE ANALYZED: JUNE 13, 1991

EPA METHOD 8010-PURGEABLE HALOCARBONS

Concentrations were calculated using a 4 point curve of concentrations 5, 10, 15 and 20 ppb.

CONTINUING CALIBRATION CURVE VERIFICATION.

COMPOUND	CCCV % RECOVERY (15ppb)
t,1,2-DICHLOROETHENE	95%
1,1,1-TRICHLOROETHANE	97%
CHLOROFORM	101%
TETRACHLOROETHENE	96%
1,2-DICHLOROPROPANE	102%
CARBONTETRACHLORIDE	95%

SPIKE DATA

Log# 6537-91 was spiked in duplicate with a 15 ppb 8010 standard.

COMPOUND	SPIKE %RECOVERY	RELATIVE % DIFFERENCE
1,1 DICHLOROETHENE	86%	10%
TRICHLOROETHENE	93%	10%
1,1 DICHLOROETHANE	87%	12%
CHLOROFORM	91%	12%
TETRACHLOROETHENE	84%	13%

A complete list of compounds is available upon request.

LISA MACCLELLAN
QA/QC DIRECTOR

QUALITY CONTROL TERMINOLOGY

*CCCV-CONTINUING CALIBRATION CURVE VERIFICATION. REPORTED AS % RECOVERY OF AN INDEPENDENT STANDARD TO VERIFY LINEARITY OF THE OPERATING STANDARD CURVE. ACCEPTABLE RANGE IS 80%-120% RECOVERY.
*SPIKE-ENVIRONMENTAL SAMPLE IS MATRIX SPIKED WITH METHOD COMPOUNDS AND % RECOVERY OF CONCENTRATION SPIKED INTO SAMPLE IS CALCULATED. REPORTED AS % RECOVERY. ACCEPTABLE RANGE FOR "NORMAL MATRIX SAMPLES" IS 75%-125% RECOVERY.
*SURROGATES-COMPOUNDS REPRESENTATIVE OF A GROUP OF COMPOUNDS. SURROGATES ARE SPIKED INTO ENVIRONMENTAL SAMPLES AND

QUALITY CONTROL REPORT, CONTINUED
JUNE 27, 1991

TETRA TECH
ORGANOCHLORINE PESTICIDES AND PCBs
LOG #7993-91 THROUGH 7998-91
DATE EXTRACTED: JUNE 7, 1991
DATE ANALYZED: JUNE 17, 1991

EPA METHOD 8080

Concentrations were calculated against 4 point calibration curves of concentrations 25, 50, 100 and 200 ppb.

CONTINUING CALIBRATION CURVE VERIFICATION

A 100 ppb standard verification sample was run in the sample set up.

COMPOUND	CCCV % RECOVERY
Beta-BHC	102%
Gamma-BHC	95%
Heptachlor Epoxide	103%
Endrin	104%
4,4-DDD	110%
Dieldrin	103%
Heptachlor	96%
Methoxychlor	117%

SPIKE DATA

The laboratory control sample was spiked with 0.5ppb 8080 standard.

COMPOUND	SPIKE % RECOVERY	DUPLICATE RPD
Endosulfan I	104%	0%
Gamma-BHC	110%	2%
Methoxychlor	116%	9%
Endosulfan Sulfate	103%	3%
Aldrin	105%	0%

A complete list is available upon request.

LISA MACCLELLAN
QA/QC DIRECTOR

QUALITY CONTROL TERMINOLOGY

*CCCV-CONTINUING CALIBRATION CURVE VERIFICATION. REPORTED AS % RECOVERY OF AN INDEPENDENT STANDARD TO VERIFY LINEARITY OF THE OPERATING STANDARD CURVE. ACCEPTABLE RANGE IS 80%-120% RECOVERY.
*SPIKE-ENVIRONMENTAL SAMPLE IS MATRIX SPIKED WITH METHOD COMPOUNDS AND % RECOVERY OF CONCENTRATION SPIKED INTO SAMPLE IS CALCULATED. REPORTED AS % RECOVERY. ACCEPTABLE RANGE FOR "NORMAL MATRIX SAMPLES" IS 75%-125% RECOVERY.
*SURROGATES-COMPOUNDS REPRESENTATIVE OF A GROUP OF COMPOUNDS. SURROGATES ARE SPIKED INTO ENVIRONMENTAL SAMPLES

QUALITY CONTROL REPORT, CONTINUED
JUNE 27, 1991

TETRA TECH
LOG #7993-91 THROUGH 7998-91
DATE EXTRACTED: JUNE 6, 1991
DATE ANALYZED: JUNE 13, 1991

EPA METHOD 8150

ANALYSES	CCCV %RECOVERY
2,4-D	107%
2,4,5-TP (SILVEX)	113%

LISA MACCLELLAN
QA/QC DIRECTOR

QUALITY CONTROL TERMINOLOGY

*CCCV-CONTINUING CALIBRATION CURVE VERIFICATION. REPORTED AS % RECOVERY OF AN INDEPENDENT STANDARD TO VERIFY LINEARITY OF THE OPERATING STANDARD CURVE. ACCEPTABLE RANGE IS 80%-120% RECOVERY.
*SPIKE-ENVIRONMENTAL SAMPLE IS MATRIX SPIKED WITH METHOD COMPOUNDS AND % RECOVERY OF CONCENTRATION SPIKED INTO SAMPLE IS CALCULATED. REPORTED AS % RECOVERY. ACCEPTABLE RANGE FOR "NORMAL MATRIX SAMPLES" IS 75%-125% RECOVERY.
*SURROGATES-COMPOUNDS REPRESENTATIVE OF A GROUP OF COMPOUNDS SUBJECT

QUALITY CONTROL REPORT, CONTINUED
TETRA TECH
LOG # 7993-91 THROUGH 7998-91
DATE ANALYZED: JUNE 14, 1991
DATE EXTRACTED: JUNE 14, 1991

EPA METHOD 8240 (TCLP)

CONTINUING CALIBRATION CURVE VERIFICATION

COMPOUND	CCCV % RECOVERY
VINYL CHLORIDE	96%
METHYLENE CHLORIDE	105%
CHLOROFORM	93%
1,2,-DICHLOROPROPANE	100%
TOLUENE	101%
ETHYLBENZENE	100%

	SURROGATE RECOVERIES		
LOG#	1,2-DICHLOROETHANE-D4	TOLUENE-D8	BROMOFLUOROBENZENE
7994-91	105%	86%	99%

LISA MACCLELLAN
QA/QC DIRECTOR

QUALITY CONTROL TERMINOLOGY

*CCCV-CONTINUING CALIBRATION CURVE VERIFICATION. REPORTED AS % RECOVERY OF AN INDEPENDENT STANDARD TO VERIFY LINEARITY OF THE OPERATING STANDARD CURVE. ACCEPTABLE RANGE IS 80%-120% RECOVERY.
*SPIKE-ENVIRONMENTAL SAMPLE IS MATRIX SPIKED WITH METHOD COMPOUNDS AND % RECOVERY OF CONCENTRATION SPIKED INTO SAMPLE IS CALCULATED. REPORTED AS % RECOVERY. ACCEPTABLE RANGE FOR "NORMAL MATRIX SAMPLES" IS 75%-125% RECOVERY

QUALITY CONTROL REPORT, CONTINUED
JUNE 27, 1991

TETRA TECH
LOG #7993-91 THROUGH 7998-91
DATE EXTRACTED: JUNE 10, 1991
DATE ANALYZED: JUNE 11, 1991
JUNE 12, 1991 - MERCURY

TITLE 22 METALS (TTLC)

ANALYSES	METHOD	CCCV %RECOVERY	SPIKE %RECOVERY	DUPLICATE RPD
ANTIMONY	6010	106%		0%
ARSENIC	6010	110%	88%	4%
BARIUM	6010	101%	101%	2%
BERYLLIUM	6010	104%	95%	0%
CADMIUM	6010	104%	104%	1%
CHROMIUM	6010	103%	107%	1%
COBALT	6010	110%	109%	3%
COPPER	6010	104%		3%
LEAD	6010	104%	95%	4%
MERCURY	7471	92%	92%	0%
MOLYBDENUM	6010	82%	41%*	2%
NICKEL	6010	101%	102%	2%
SELENIUM	6010	115%	57%*	0%
SILVER	6010	96%	99%	27%*
THALLIUM	6010	96%	101%	1%
VANADIUM	6010	97%	99%	1%
ZINC	6010	119%	26%*	0%

* SPIKE RECOVERIES AND DUPLICATE RPD WERE OUT OF RANGE DUE TO SAMPLE MATRIX EFFECT.

LISA MACCLELLAN
QA/QC DIRECTOR

QUALITY CONTROL TERMINOLOGY

*CCCV-CONTINUING CALIBRATION CURVE VERIFICATION. REPORTED AS % RECOVERY OF AN INDEPENDENT STANDARD TO VERIFY LINEARITY OF THE OPERATING STANDARD CURVE. ACCEPTABLE RANGE IS 80%-120% RECOVERY.
*SPIKE-ENVIRONMENTAL SAMPLE IS MATRIX SPIKED WITH METHOD COMPOUNDS AND % RECOVERY OF CONCENTRATION SPIKED INTO SAMPLE IS CALCULATED. REPORTED AS % RECOVERY. ACCEPTABLE RANGE FOR "NORMAL MATRIX SAMPLES" IS 75%-125% RECOVERY.
*SURROGATES-COMPOUNDS REPRESENTATIVE OF A GROUP OF COMPOUNDS. SURROGATES ARE SPIKED INTO ENVIRONMENTAL SAMPLES

Quality Assurance Laboratory
6605 Nancy Ridge Drive
San Diego, CA 92121 (619) 552-3636

CHAIN OF COUSTODY

Date: 5 June 91 Page 1 of 1

CUSTOMER INFORMATION

COMPANY: TETRA TECH INC
PROJECT MANAGER: J.R. HOLLINGSWORTH
ADDRESS:
PHONE: 450-0365

PROJECT INFORMATION

PROJECT NAME/NUMBER: EL CENTRO

BILLING INFORMATION

BILL TO:
ADDRESS:
PHONE: PO #:

ANALYSIS REQUEST

QA LOG #	SAMPLE ID	SAMPLE DATE	SAMPLE TIME	SAMPLE MATRIX	CONTAINER TYPE	NUMBER OF CONTAINERS	418.1
993	ST-2	5 June		soil	GLASS	1	✓
994	ST-18					1	✓
995	ST-24					1	✓
996	ST-35					1	✓
997	ST-40					1	✓
998	ST-60					1	✓

See attached quote as per Jr. Hollingsworth for additional analysis. Composite samples 2, 18, 40

mn

RECEIVED JUN 5 PM 4:32

SAMPLE INTEGRITY

HOLDING TIME
CORRECT CONTAINER Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N Y/N

1. RELINQUISHED BY:	DATE:	2. RELINQUISHED BY:	DATE:	3. RELINQUISHED BY:	DATE:
SIGNATURE: [signature]	6/5/91	SIGNATURE:		SIGNATURE:	
PRINTED NAME: R Hollingsworth	TIME:	PRINTED NAME:	TIME:	PRINTED NAME:	TIME:
COMPANY: Tetra Tech Inc	1632	COMPANY:		COMPANY:	
1. RECEIVED BY:	DATE:	2. RECEIVED BY:	DATE:	3. RECEIVED BY:	DATE:
SIGNATURE: John Edwards	6/5/91	SIGNATURE:		SIGNATURE:	
PRINTED NAME: John Edwards	TIME:	PRINTED NAME:	TIME:	PRINTED NAME:	TIME:
COMPANY: QA Lab	1632	COMPANY:		COMPANY:	

SAMPLE RECEIPT

RECEIVED ON ICE (YES) / NO
TAPE SEAL INTACT YES / NO / (NA)
PRESERVATIVE YES / (NO)
PRECAUTIONS:

SPECIAL INSTRUCTIONS

TAT REQUESTED: Normal

ALL SAMPLES ARE SUBJECT...

ATTACHMENT 2

QUALITY ASSURANCE LABORATORY CHAIN OF CUSTODY DOCUMENT DATED 7 JUNE 1991 RESULTS FROM ENVIRONMENTAL AND ENERGY SERVICES CO. DATED 25 June 1991 FOR QUALITY ASSURANCE LABORATORY SAMPLE 7933/7998 COMP.

QUALITY ASSURANCE LABORATORY
6605 NANCY RIDGE DRIVE
SAN DIEGO, CALIFORNIA 92121
(619) 552-3636

TETRA TECH
ATTN: J. R. HOLLINGWORTH
9645 SCRANTON ROAD #200
SAN DIEGO, CA 92121

DATE OF REPORT	JUNE 28, 1991
DATE RECEIVED	JUNE 5, 1991
DATE OF SAMPLE	JUNE 5, 1991
DATE COMPLETED	JUNE 26, 1991
ANALYZED BY	ERC ENVIRONMENTAL
SAMPLE TYPE	1 SOIL COMPOSITE
PROJECT NAME	EL CENTRO

ERC - Environmental and Energy Services Company

Bioassay Laboratory

10477 C Roselle Street
San Diego, CA 92121
(619) 458-9044 ext 208

Client Name: Quality Assurance Labs Address: 6605 Nancy Ridge Rd., San Diego 92121

Sample ID: 7993 - 7998 Results: LC50 > 750 mg/l

Sample and Bioassay Information

Test Type: Screening
Test Species: *Pimephales promelas*
Organism Supplier: Thomas Fish Company
Acclimation Period: 12 days
Mean Length (mm): 32.2
Range (mm): 27-39
Water Source: Charcoal Filtered Tapwater
Sample Receipt Date: 6/7/91

Test Conditions: Static
Common Name: Fathead minnow
Number per Tank: 10
Acclimation Temp. (°C): 20 ± 2
Mean Weight (g): 0.33

Test Solution Volume (liters) 8
Test Dates: 6/10/91 to 6/14/91

Results Summary

Treatment	Rep.	Initial Count	Final Count	Percent Mortality	Average Mortality
Control	A	10	9	10	
	B	10	9	10	10
250 mg/l	A	10	10	0	
	B	10	9	10	5
500 mg/l	A	10	10	0	
	B	10	10	0	0
750 mg/l	A	10	7	30	
	B	10	10	0	15

LC50 (95% confidence intervals): >750 mg/l
Calculation Method: not necessary
Analyst (s): Alan Mangis Date: 6/25/91
Results Verified by: [signature] Date: 6/25/91

Freshwater Test

Toxicity Test Data Sheet - ERCE Bioassay Laboratory

Client: QA Labs
Sample ID: 7943 - 7948
Contact: Mary Simpson
EBL #: 91477

Start Date & Time: 6/10/91 1635
End Date & Time: 6/14/91 1635
Test Organism: P. promelas
Test Protocol: Title 22

Conc. or %	Rep	Number of Live Organisms					Dissolved Oxygen (mg/l)					pH (units)					Conductivity (µmhos-cm)					Temperature (°C)					Percent Survival
		0	24	48	72	96	0	24	48	72	96	0	24	48	72	96	0	24	48	72	96	0	24	48	72	96	
Cont	A	10	9	9	9	9	5.3	8.4	8.9	8.5	8.4	7.57	7.70	7.11	7.17	7.79	205				230	22.0	20.4	20.2	20.2	20.3	90
	B	10	10	10	9	9	6.1	8.4	8.9	8.4	8.4	7.33	7.05	7.14	7.38	7.77	170				180	22.0	20.2	20.1	20.1	20.1	90
250	A	10	10	10	10	10	6.3	8.4	8.8	8.6	8.3	7.22	7.10	7.15	7.39	7.64	180				180	22.0	20.2	20.1	20.2	20.2	100
	B	10	10	10	10	9	6.3	8.4	8.9	8.7	8.5	7.25	7.08	7.27	7.53	7.61	175				175	22.0	20.1	20.1	20.1	20.1	90
500	A	10	10	10	10	10	6.1	8.4	8.8	8.6	8.4	7.27	7.08	7.27	7.49	7.60	175				185	22.0	20.2	20.2	20.2	20.1	100
	B	10	10	10	10	10	6.2	8.4	8.9	8.6	8.5	7.25	7.22	7.26	7.41	7.53	175				185	22.0	20.1	20.1	20.1	20.1	100
750	A	10	10	10	9	7	6.1	8.4	8.9	8.7	8.3	7.24	7.22	7.35	7.47	7.63	185				175	22.0	20.1	20.1	20.2	20.2	70
	B	10	10	10	10	10	6.0	8.4	8.8	8.6	8.5	7.25	7.30	7.34	7.45	7.52	185				185	22.0	20.2	20.2	20.1	20.2	100

Conc.	Alkalinity (mg/l as CaCO3)		Hardness (mg/l as CaCO3)		Chlorine Residual (mg/l)
	Initial	Final	Initial	Final	
control	36	37	48	48	ND
highest conc.	35	36	90	90	ND

Analysts: Alan

Comments:
0 hrs: Sample: Soil
24 hrs. None
48 hrs. None
72 hrs. None
96 hrs. None

ERCE Bioassay Laboratory
10477 C Roselle Street
San Diego, CA 92121
(619) 459-9044

Information extracted from:

U.S. Geological Survey, El Centro Quadrangle, California, 7.5-Minute Series (topographic), Photorevised 1979.

APPENDIX E

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Bechtel Environmental, Inc.
P.O. Box 193965
San Francisco, CA 94119-3965

OBSERVATIONS MADE BY: Eric S. Wilson DATE: May 23, 1994

FACILITY REPRESENTATIVE(S) and TITLE(S):

Louie Ramirez, President
Ken Mack, Southwest Regional Manager

SITE: Valley Iron and Metal (Edman Corp.)

EPA ID: CA0 000001156

A site reconnaissance was conducted at the Valley Iron and Metal site on May 23. The weather was sunny and the temperature was approximately 85°F. The Bechtel Environmental, Inc. (BEI) representative, Eric S. Wilson, conducted the site reconnaissance with Mr. Ramirez and Mr. Mack at 1 p.m. to gather information on the site location and size, site history, processes used, and any hazardous waste generated, treated, stored, or disposed of on site. The BEI representative was provided with a packet of information prepared in response to BEI's letter dated April 21. The reconnaissance included a site tour during which photographs were taken.

The following information was obtained during the site reconnaissance:

The site occupies approximately 53 acres, 3 miles east of El Centro in a mixed rural-agricultural area. The site is bordered to the north by a General Motors Truck dealership, to the east by undeveloped land, to the south by the Southern Pacific Railroad and Route 80, and to the west by Highway 111 and undeveloped land.

Currently, about 5 acres of the site consists of an office building, a residence, a large metal works building, a small copper storage building, a truck scale, a large automobile compactor, and a small bailing machine shop. The remaining 48 acres of the site are used to store scrap metal products which range from old automobiles to empty storage tanks to scrap metal. Approximately 90 percent of the site is unpaved. A fence topped with barbed wire, encloses the site.

Prior to 1957, site operations consisted of a metal salvage business. In 1957, when the current owner of Valley Iron and Metal purchased and moved onto the 53 acre site, operations remained the same. Additional information on the past owners of the site is not known at this time.

Currently the site operates as a metal salvage yard. Scrap metal is brought on site, weighed, separated, stored, and shipped off site to a recycling facility. During the site reconnaissance, 55-gallon drums of unknown contents, automobiles, refrigerators, odd sizes of wire, large storage

tanks, and various odd pieces of scrap metal were stored in piles on the unpaved yard. In the western portion of the site, a large automobile compactor and a baling machine operate to compress and pack scrap metals for shipment off site. There is also a large metal shop building where purchased metal pieces are brought on site and modified to various sizes for sale. At the time of the site visit no hazardous substances were used or generated in onsite operations.

Surface water runoff from the site flows to the south and southwest onto exposed barren soils adjacent to the site. During periods of heavy rainfall, a drainage ditch parallel to the dirt road and the Southern Pacific Railroad collects surface water runoff from the site. There are no surface water bodies within 2 miles of the site.

The site is in a mixed rural-agricultural area approximately 3 miles east of El Centro. The parking lot and the first 40 feet of the main entrance are paved while all the other out-of-doors surface areas within the site are unpaved. All onsite operations occur outdoors within the unpaved yard. The site consists of various sized piles of recyclable scrap metal stored in unpaved areas.

The number of workers on site is approximately 17. The only onsite residence is a mobile home used by the night watch person. No schools or daycare centers are on the same property and within 200 feet of contamination associated with the site. The nearest offsite residence is approximately 0.5 mile from the eastern site boundary.

APPENDIX C

CONTACT LOG

Site: Valley Iron and Metal (Edman Corp.)

EPA ID: CA0 000001156

Name	Affiliation	Phone	Date	Information
Mark Johnston	Department of Health Services, Imperial County Division of Environmental Health Services (DEHS)	(619) 339-4203	4/20/94	Mr. Johnston explained that the DEHS does have a file on the site and an appointment has been arranged to view the file. Additionally, it was discovered during the phone conversation that the correct name of the facility is Edman Corp., not Rodman Corp. Mr. Johnston also explained that some contaminated soil at the site had to be deposited at a Class I landfill. He also explained that the facility used to recycle batteries and transformers. An appointment to review the file has been arranged.
Julie Johnson	California Environmental Protection Agency, Department of Toxic Substances Control DTSC), Region 4	(310) 590-4980	4/22/94	The DTSC does not have any files on the Valley Iron and Metal site.
Ron Rodriguez	California Environmental Protection Agency, Regional Water Quality Control Board (RWQCB), Colorado River Basin Region	(619) 776-8944	4/22/94	The RWQCB does not maintain a file on this site and the agency is not involved with any regulatory activity with the Valley Iron and Metal site.
Paul Steward	Water Treatment Facility	(619) 337-4575	6/2/94	See Contact Report.

FEB-27-92 THU 17:42 LA[illegible]AW IMPERIAL VALLEY FAX NO. 344[illegible]5 REFERENCE 6

Form Approved OMB No. 2050—0039 (Expires 9-30)
and Front of Page

Please print or type. *Form designed for use on elite (12-pitch typewriter).*

90535889

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAL000076444 Manifest Document No. 00001

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address EDMAN CORPORATION
P.O. Box 335, El Centro, CA 92244

A. State Manifest Document Number 90535889

4. Generator's Phone (619) 352-2630

B. State Generator's ID SRFTHA25-112746

5. Transporter 1 Company Name Laidlaw Environmental

6. US EPA ID Number CAD000083121

C. State Transporter's ID 30746

D. Transporter's Phone 619-344-9400

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address Laidlaw Environmental Services (IV) Inc.
5295 S. Garvey Rd
Westmorland, CA 92281

10. US EPA ID Number CAD000633164

G. State Facility's ID CAD099633164

H. Facility's Phone 619-344-9400

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. NON-RCRA HAZ. WASTE SOLID "Contaminated Soil"	001	DT	18	Y	State 611
					EPA/Other
b.					State
					EPA/Other
c.					State
					EPA/Other
d.					State
					EPA/Other

J. Additional Descriptions for Materials Listed Above
SITE: 2004 Hwy 111
Corner of Hwy 111 & Hwy 80
El Centro, CA
APP. # 80317

K. Handling Codes for Wastes Listed Above
a. 03/181 b.
c. d.

15. Special Handling Instructions and Additional Information
Hardhats, boots, gloves, tarp load.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: LUIS E. RAMIREZ — Signature: Luis E. Ramirez — Month Day Year: 10/12/92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: LARRY PAULSEN — Signature: [illegible] — Month Day Year: 10/12/92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: [illegible] — Signature: [illegible] — Month Day Year: 10/12/92

DHS 8022 A
EPA 8700—22
(Rev. 6-89) Previous editions are obsolete.

Do Not Write Below This Line

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

Document № 2044845

WEIGHMASTER CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

FEB-27-92 THU 17:44 LAIDLAW IMPERIAL VALLEY FAX NO. 3449405 P.03

SITE: IMPERIAL VALLEY

WMU: 3 SEC: C-2 ELEV: 20-30

GENERATOR: EDMAN CORPORATION

HAULER: LAIDLAW (IV)

MATERIAL DESCRIPTION: CONTAMINATED SOIL

DATE: 01/21/92

JOB NO. / PHASE / TASK / SUB TASK: 400065

PROFIT CENTER: 2477

DISPOSAL SITE TYPE: LF

MANIFEST NUMBER: 90535889

GENERATOR OUT OF STATE: N

INTERSITE TRANSFER: N

WASTE STREAM NUMBER: 80317

DHS: 611 CRWQCB: P UCD:

CLASSIFICATION: HAZ

PRODUCT CODE: DC104

TONS: 27.07

OFFICE USE
MINIMUM DISPOSAL CHARGE
MINIMUM DISPOSAL TAX

DEPUTY -	GROSS LBS.	82970 LB 11:28 AM 01/21/92	
DEPUTY -	TARE LBS.	28830 LB 12:48 PM 01/21/92	
DEPUTY -	NET LBS.	54,140 lb	

DRIVER: [signature] CARRIER: Laidlaw (IV) FEE $

Carried For: Edman Corp.

Address From:

Laidlaw Environmental Services, Inc.
Imperial Valley Facility
Laidlaw Environmental Services, Inc.
5295 South Garvey Road
Westmorland, CA 92281
(619) 344-9400

UNITS	COMMODITY	MARK	TRUCK LICENSE NO.
27.07	Cont Soil	90535889	DP52610
			TRAILER LICENSE NO. DT70775
			TRAILER LICENSE NO.

pH LEVEL	6.04		AMMONIA	NA	PPM	DISTILLATION	NA
HCVP	0	PPM	RADIOACTIVITY	ND	CPM	PAINT FILTER	PASS
PHENOLS	<50	PPM	% OIL	0		XS OXIDANT	ND
SULFIDES	ND	PPM	% SOLIDS	>99		SPIKES	POS
CYANIDES	ND	PPM	FLASH POINT	NA	DEG/F	Density 1.37 T/yd³	

CALLOUT ____ H CALLOUT ____ S HANDLING ____ SCALE FEE ____

WIND DISPERSAL PROGRAM — WIND SPEED: 1.0 MPH DIRECTION: N

WATER SPRAY ____ SYNTHETIC COVER ____ FOAM ____ DIRT ____ OTHER ____

DRIVER PROTECTIVE GEAR REQUIRED — HARD HAT ✓ GLOVES ✓

RUBBER BOOTS ✓ RESPIRATORY PROTECTION ____ FACE SHIELD ____

POST OFF-LOAD INSPECTION — MUDFLAPS ____ TAILGATES ____ TIRES ____

INSPECTED BY ____ COMMENTS ____

You are, by this attachment, informed that Laidlaw Environmental Services, Inc.'s Imperial Valley Facility has all the required Federal, State, and Local permits necessary to receive your waste, if your waste meets all required predisposal conditions. The attached manifest is your notice that this facility has accepted this waste. This notice is being given pursuant to Section III (G) (2) of the Imperial Valley Facility's Department of Health Services Permit number 13-0001-60.

Document № 2045566

WEIGHMASTER'S CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

SITE: IMPERIAL VALLEY

WMU: 3 SEC: B-4 ELEV: 30-38

GENERATOR:
EDMAN CORPORATION

HAULER:
LAIDLAW IV

MATERIAL DESCRIPTION:
CONTAMINATED SOIL

DATE: 02/24/92

JOB NO./PHASE/TASK/SUB TASK:
[illegible]400065 7

PROFIT CENTER: 2477

DISPOSAL SITE TYPE: LF

MANIFEST NUMBER: 88524978

GENERATOR OUT OF STATE: N

INTERSITE TRANSFER: N

WASTE STREAM NUMBER: 80317

DHS: 611 CRWQCB: P UCD

CLASSIFICATION: HAZ

PRODUCT CODE: DC104

TONS: 28.91

OFFICE USE
MINIMUM DISPOSAL CHARGE
MINIMUM DISPOSAL TAX

DEPUTY - GROSS LBS. 86410 LB 10:36 AM 02/24/92

DEPUTY - TARE LBS.

DEPUTY - NET LBS. 28600 LB 11:31 AM 02/24/92

57810

DRIVER [signature] CARRIER LAIDLAW IV FEE $

Carried For: EDMAN COMP

Address From:

Laidlaw Environmental Services, Inc.
Imperial Valley Facility
Laidlaw Environmental Services, Inc.
5295 South Garvey Road
Westmorland, CA 92281
(619) 344-9400

UNITS	COMMODITY	MARK	TRUCK LICENSE NO.
28.91	Cont. Soil	88524978	BP2040
			TRAILER LICENSE NO. DT70775
			TRAILER LICENSE NO.

pH LEVEL	6.02		AMMONIA	NA	PPM	DISTILLATION	NA
HCVP	10	PPM	RADIOACTIVITY	ND	CPM	PAINT FILTER	PASS
PHENOLS	NA	PPM	% OIL	NA		XS OXIDANT	ND
SULFIDES	ND	PPM	% SOLIDS	99		SPIKES	
CYANIDES	ND	PPM	FLASH POINT	NA	DEG/F		

CALLOUT _____ H CALLOUT _____ S HANDLING _____ SCALE FEE _____

WIND DISPERSAL PROGRAM WIND SPEED: 18 MPH DIRECTION: N

WATER SPRAY ✓ SYNTHETIC COVER _____ FOAM _____ DIRT _____ OTHER _____

DRIVER PROTECTIVE GEAR REQUIRED HARD HAT _____ GLOVES ✓

RUBBER BOOTS ✓ RESPIRATORY PROTECTION _____ FACE SHIELD _____

POST OFF-LOAD INSPECTION MUDFLAPS _____ TAILGATES _____ TIRES _____

INSPECTED BY _____ COMMENTS _____

You are, by this attachment, informed that Laidlaw Environmental Services, Inc.'s Imperial Valley Facility has all the required Federal, State, and Local permits necessary to receive your waste, if your waste meets all required predisposal conditions. The attached manifest is your notice that this facility has accepted this waste. This notice is being given pursuant to Section III (G) (2) of the Imperial Valley Facility's Department of Health Services Permit number 13-0001-90.

White - Billing -:- Canary - File -:- Pink - Billing -:- Goldenrod - Hauler

Form No. 10728 • Plaza Printers 344-2306

FEB-27-92 THU 17:47 LAIDLAW IMPERIAL VALLEY FAX NO. 3449475 P.05

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FACILITY NAME/ RCRA ID	CONTACT NAME / FACILITY ADDRESS / MAILING ADDRESS	TELEPHONE	NOTIF DATE	CAL DIST/ COUNTY	FACILITY TYPE: TSD	GEN	TRN	BBL	RCY
DON E KEITH CAT982509721	E. MANAGER 2990 PIERCE RD 2990 PIERCE RD	(805)322-5031 BAKERSFIELD BAKERSFIELD	10/26/89 CA 93308 CA 93308	5 KERN	-	-	TRN	-	-
FLUIDS CONTROL, INC CAT982509903	E. MANAGER 389 LYERLY RD P O BOX 1738	(619)348-2202 CALIPATRIA CALIPATRIA	12/07/89 CA 92233 CA 92233	4 IMPERIAL	-	-	TRN	-	-
CUSTOM TRACTOR SVC CAT982518359	E. MANAGER 2098 N CORNELIA 527 W BROWNING	(209)439-0604 FRESNO FRESNO	12/18/89 CA 93722 CA 93704	5 FRESNO	-	-	TRN	-	-
NATIONAL RESOURCES, INC CAT982518433	E. MANAGER 5721 S COMPTON AVE P O BOX 4006	(213)581-9500 LOS ANGELES LOS ANGELES	01/11/90 CA 90011 CA 90051	4R LOS ANGELES	-	-	TRN	-	-
FILTER DISPOSAL SERVICE, INC CAT982521734	E. MANAGER 12210 MICHIGAN AVE P O BOX 4662	(714)783-8081 GRAND TERRACE RIVERSIDE	10/26/89 CA 92324 CA 92514	4 SAN BERNARDINO	-	-	TRN	-	-
VON EUW AND LJ TRUCKING CAT982521791	E. MANAGER 37837 VON EUW COMMON 38253 GRANVILLE DRIVE	(415)793-7638 FREMONT FREMONT	10/26/89 CA 94536 CA 94536	2 ALAMEDA	-	-	TRN	-	-
TESTING AND TECHNOLOGY CAT982521858	E. MANAGER 25-L COMMERCIAL BLVD 25-L COMMERCIAL BLVD	(415)883-5070 NOVATO NOVATO	10/26/89 CA 94949 CA 94949	2 MARIN	-	-	TRN	-	-
STEVE WILLS TRUCKING CAT982521916	E. MANAGER 1018 HIGHWAY 36 P O BOX 65	(707)725-5134 ALTON FORTUNA	10/26/89 CA 95540 CA 95540	2 HUMBOLDT	-	-	TRN	-	-
BERGSTROM FAMILY CLEANERS CA0000001123	J. BERGSTROM 2934 E PACIFIC COAST HWY 2934 E PACIFIC COAST HWY	(714)644-4446 CORONA DEL MAR CORONA DEL MAR	09/10/93 CA 92625 CA 92625	ORANGE	-	SQG	-	-	-
MORROW CRANE CA0000001149	B. FRASIER 833 HANNA DR 833 HANNA DR	(707)644-3731 AMERICAN CANYON AMERICAN CANYON	08/27/93 CA 95489 CA 95489	NAPA	-	SQG	-	-	-
UNIQUE SOLUTIONS CA0000001776	N. CLARK 1781 CAPITAL ST P O BOX 2650	(909)371-1314 CORONA CORONA	09/20/93 CA 91720 CA 91720	RIVERSIDE	-	-	TRN	-	-
SAFEWAY NO 3031 CA0000001784	W. CLIFFORD 85 WESTLAKE MALL 85 WESTLAKE MALL	(415)755-0576 DALY CITY DALY CITY	09/20/93 CA 94015 CA 94015	SAN MATEO	-	SQG	-	-	-

REFERENCE 7

APPENDIX C

CONTACT LOG

Site: Valley Iron and Metal (Edman Corp.)

EPA ID: CA0 000001156

Name	Affiliation	Phone	Date	Information
Mark Johnston	Department of Health Services, Imperial County Division of Environmental Health Services (DEHS)	(619) 339-4203	4/20/94	Mr. Johnston explained that the DEHS does have a file on the site and an appointment has been arranged to view the file. Additionally, it was discovered during the phone conversation that the correct name of the facility is Edman Corp., not Rodman Corp. Mr. Johnston also explained that some contaminated soil at the site had to be deposited at a Class I landfill. He also explained that the facility used to recycle batteries and transformers. An appointment to review the file has been arranged.
Julie Johnson	California Environmental Protection Agency, Department of Toxic Substances Control DTSC), Region 4	(310) 590-4980	4/22/94	The DTSC does not have any files on the Valley Iron and Metal site.
Ron Rodriguez	California Environmental Protection Agency, Regional Water Quality Control Board (RWQCB), Colorado River Basin Region	(619) 776-8944	4/22/94	The RWQCB does not maintain a file on this site and the agency is not involved with any regulatory activity with the Valley Iron and Metal site.
Paul Steward	Water Treatment Facility	(619) 337-4575	6/2/94	See Contact Report.

REFERENCE 10

CONTACT REPORT

AGENCY/AFFILIATION: Water Treatment Facility		CODE: GW
DEPARTMENT: NA		
ADDRESS: P.O. Box 4450	CITY: El Centro	
COUNTY: Imperial	STATE: CA	ZIP: 92244
CONTACT(S) Paul Steward	TITLE Supervisor	PHONE (619) 337-4575
BEI PERSON MAKING CONTACT: Eric S. Wilson EW		DATE: 6/2/94
SUBJECT: Groundwater use in Imperial Valley		
SITE NAME: Valley Iron and Metal (Edman Corp.)	EPA ID: CA0 000001156	

DISCUSSION:

There are no municipal wells within 4 miles of the Valley Iron and Metal site, which is located at the intersection of Highways 111 and 80. Groundwater in the area is not suitable for human consumption or agricultural purposes because the groundwater is brackish. In addition, since topography in the Imperial Valley is relatively flat, groundwater does not move in any lateral direction.

People in the Imperial Valley receive drinking water from the Colorado River. Surface water is brought to the valley by way of a canal system. There are approximately 100,000 people in Imperial Valley that receive drinking water from the canal system.

The depth to groundwater in the vicinity of the site varies between 8 to 20 feet below ground surface.

CONTACT CONCURRENCE: _____ **DATE:** _____

Information extracted from:

California Department of Fish and Game, Natural Diversity Database, 1991.

******* CONFIDENTIAL *******
******* PREDECISIONAL DOCUMENT *******

SUMMARY SCORESHEET FOR COMPUTING PROJECTED HRS SCORE

SITE NAME: Valley Iron and Metal (Edman Corp.)

CITY: El Centro **COUNTY:** Imperial County

EPA ID #: CA0 000001156 **EVALUATOR:** Eric S. Wilson

PROGRAM ACCOUNT #: _____ **DATE:** May 24, 1994

LAT/LONG: 32° 48' 06.0" North / 115° 30' 13.0" West **T/R/S:** T. 15 S. / R. 14 E.

THIS SCORESHEET IS FOR A **PA:** X **SI:** _____

OTHER: _____

RCRA STATUS (check all that apply):

- ____ Generator
- ____ Small Quantity Generator
- ____ Transporter
- ____ TSDF
- X Not Listed in RCRA Database as of (Date of Printout) 4/15/94

STATE SUPERFUND STATUS:

- ____ DTSC Annual Work Plan (formerly BEP) (Date) _____
- ____ WQARF (Date): _____
- X No State Superfund Status (Date): _____

	S Pathway	S^2 Pathway
Groundwater Migration Pathway Score (Sgw)	*	*
Surface Water Migration Pathway Score (Ssw)	*	*
Soil Exposure Pathway Score (Ss)	11.41	130.19
Air Migration Pathway Score (Sa)	*	*
$\left(S_{gw}^2 + S_{sw}^2 + S_{se}^2 + S_{am}^2\right)$		130.19
$\left(S_{gw}^2 + S_{sw}^2 + S_{se}^2 + S_{am}^2\right) / 4$		32.55
$\sqrt{\left(S_{gw}^2 + S_{sw}^2 + S_{se}^2 + S_{am}^2\right) / 4}$		5.71

* Pathway evaluated, but not assigned a score (explain):

* The Groundwater Migration Pathway was evaluated, but not assigned a score because there are no municipal groundwater well within 4 miles of the site.

* The Surface Water Migration Pathway was evaluated, but not assigned a score because there are no surface water bodies within two miles of the site.

* The Air Migration Pathway was evaluated, but not assigned a score because there is no documentation to support a release to air.

SOIL EXPOSURE PATHWAY SCORESHEET

RESIDENT POPULATION THREAT

Likelihood of Exposure	Maximum Value	Score	Rationale	Data Quality
1. Likelihood of Exposure	550	550	1	E
Waste Characteristics				
2. Toxicity	(a)	10,000	2	H
3. Hazardous Waste Quantity	(a)	10	3	H
4. Waste Characteristics (lines 2 x 3, then use Table 2-7)	100	18		
Targets				
5. Resident Individual	50	50	4	E
6. Resident Population				
6a. Level I Concentrations	(b)	40	5	E
6b. Level II Concentrations	(b)	0		
6c. Resident Population (lines 6a+6b)	(b)	40	5	E
7. Workers	15	5	6	H
8. Resources	5	0	7	H
9. Terrestrial Sensitive Environments	(d)	0	8	H
10. Targets (lines 5+6c+7+8+9)	b	95		
Resident Population Threat Score				
11. Resident Population Score (lines 1 x 4 x 10)	(b)	940,500		

SOIL EXPOSURE PATHWAY SCORESHEET

NEARBY POPULATION THREAT

Likelihood of Exposure	Maximum Value	Score	Rationale	Data Quality
12. Attractiveness/Accessibility	100	10	9	H
13. Area of Contamination Value	100	100	10	E
14. Likelihood of Exposure (use Table 5-8)	500	125		
Waste Characteristics				
15. Toxicity	(a)	10,000	2	H
16. Hazardous Waste Quantity	(a)	10	3	H
17. Waste Characteristics (lines 15 x 16, then use Table 2-7)	100	18		
Targets				
18. Nearby Individual	1	0	11	H
19. Population Within 1 Mile	(b,c)	0.5	12	H
20. Targets (lines 18+19)	(b)	0.5		
Nearby Population Threat Score				
21. Nearby Population Threat (lines 14 x 17 x 20)	(b)	1,057.5		

SOIL EXPOSURE PATHWAY SCORE

22. Soil Exposure Pathway Score (Ss) [lines (11+21) / 82,500, subject to a maximum of 100]	100	11.41

(a) Maximum value applies to waste characteristics category.
(b) Maximum value not applicable.
(c) Value computed on attached calculation sheet.
(d) No specific maximum value applies to factor. However, pathway score based solely on sensitive environments is limited to maximum of 60.

SOIL EXPOSURE PATHWAY CALCULATIONS

POTENTIAL CONTAMINATION, POPULATION WITHIN 1 MILE

Distance Ring (Miles)	Total Population within Distance Ring	Distance Weighted Population Values (Table 5-10)
0 to 0.25	33	1
>0.25 to 0.50	48	1
>0.50 to 1.00	394	3
	SUM	5
	POTENTIAL CONTAMINATION (SUM/10)	0.5

HRS Rationale Sheet
Valley Iron and Metal (Edman Corp.)
CA0 000001156

1. In June 1991, six soil samples were collected from a soil pile onsite. Analytical results indicated the presence of arsenic at concentrations up to 19.8 milligrams per kilogram (mg/kg), cadmium at concentrations up to 38.1 mg/kg, lead concentrations up to 1,910 mg/kg, mercury concentrations up to 3.0 mg/kg, and polychlorinated biphenyl concentrations up to 18.5 mg/kg. No background samples were collected during the June sampling of the soil pile.

   At the preliminary assessment stage an observed release to onsite soils is being projected. It is assumed that if background samples were collected from another onsite location the levels detected in the soil pile would be three times greater than the concentrations detected during the June 1991 soil sampling event. Therefore, a value of 550 is being assigned for the likelihood of exposure.

   Source: Valentine, David W., Tetra Tech, Inc., Report sent to Louie Ramirez, Edman Corporation, July 3, 1991.

2. The Hazardous Substances associated with this site are as follows:

Hazardous Substance	Toxicity
Lead	10,000
Mercury	10,000

   A toxicity value of 10,000 is being assigned.

   Source: Valentine, David W., Tetra Tech, Inc., Report sent to Louie Ramirez, Edman Corporation, July 3, 1991.

3. A Hazardous Waste Quantity value of 10 is being assigned because Level I concentrations are being projected for the onsite resident and onsite workers and 10 is the default value used when Level I concentrations have been assigned.

4. A Resident Individual value of 50 is being assigned because Level I concentrations are being projected at the site.

5. It is assumed that the onsite residence contains four people and all of these people are being assigned Level I concentrations. Therefore, a value of 40 is being assigned for Resident Population.

   Source: Wilson, Eric S., Bechtel Environmental, Inc., Site Reconnaissance Interview and Observation Report, May 23, 1994.

6. According to the Federal Register, 40 CFR Part 300 Hazard Ranking System, Final Rule, Section 5.1.3.2.3 a value of 5 is being assigned for the 17 onsite workers.

   Source: Wilson, Eric S., Bechtel Environmental, Inc., Site Reconnaissance Interview and Observation Report, May 23, 1994.

7. A zero is being assigned for the resources value because there is no evidence that any part of the observed contamination on site is used for agricultural or commercial livestock production or grazing.

   Source: Natural Diversity Database, California Department of Fish and Game, 1991.

   Wilson, Eric S., Bechtel Environmental, Inc., Site Reconnaissance Interview and Observation Report, May 23, 1994.

8. There are no sensitive environments associated with the site.

   Source: Wilson, Eric S., Bechtel Environmental, Inc., Site Reconnaissance Interview and Observation Report, May 23, 1994.

9. The entire site is enclosed by a fence but there are sections of the fence in disrepair, thereby making access to the site possible, however the site poses no public recreational use. Therefore, a value of 10 is being assigned.

10. At the preliminary assessment stage the entire 50 acre site is being considered to be contaminated, therefore a value of 10 is being assigned for the Area of Contamination Value.

    Source: Wilson, Eric S., Bechtel Environmental, Inc., Site Reconnaissance Interview and Observation Report, May 23, 1994.

11. There is one onsite residences at the Valley Iron and Metal site, and it is being assumed that there are a total of four occupants in the residence. Therefore, a value of 0 is assigned for Nearby Individual value.

12. Refer to the Potential Contamination, Population Within 1 Mile worksheet in the scoresheets.